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STATE OF MICHIGAN

IN THE 12th DISTRICT COURT FOR THE COUNTY OF JACKSON

PEOPLE OF THE STATE OF MICHIGAN,

V	File: 2003173FY
PETE MUSICO	2003172FY
JOSEPH MATTHEW MORRISON	2003171FY
PAUL EDWARD BELLAR	

Defendant.

/

PROBABLE CAUSE HEARING

VOL. 1

BEFORE THE HONORABLE MICHAEL J KLAEREN, DISTRICT JUDGE

Jackson, Michigan - Wednesday March 3, 2021

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1 Jackson, Michigan

2 Wednesday March 3, 2021- 9:04 a.m.

3 THE COURT: Okay. I'm going to call the cases of
4 People versus Mr. Pete Musico 2003173fy, People versus Joseph
5 Morrison; this is file number 2003172fy and People versus
6 Paul Bellar, file 2003171fy. Each of the defendants are
7 charged with gang membership, providing material support to a
8 terrorist organization and felony firearm. I would note that
9 in addition defendants Musico and Morrison are also charged
10 with a false report or threat of terrorism. The incident
11 date is actually a time period 11-1-19 through 10-7-20. I
12 believe I have all of the defendants here; I do know that I
13 have a full complement of lawyers. We did engage off the
14 record with a number of housekeeping issues most of which I
15 don't think need to be repeated on the record. However, I
16 would note that it is agreed that the assisting officer from
17 I believe it's the State Police and the assisting officer
18 from the FBI can remain in the courtroom. Secondarily there
19 is a sequestration order, in other words all witnesses need
20 to stay outside the courtroom other than potentially the
21 assisting officers. Any witness that is called to testify,
22 unless he or she is excused from this particular hearing. In
23 other words, there's always the potential of a rebuttal
24 witness. If there is a potential of someone being called as
25 a rebuttal witness or as a witness for the defense that

1 individual remains sequestered, is not to read any
2 publications concerning this matter and should not be
3 watching you tube. This is being televised over you tube, in
4 many regards it's going get much wider play than if we'd
5 allowed everyone into the courtroom. The order of cross-
6 examination will be Mr. Kirkpatrick; will go first, he
7 represents Mr. Bellar.

8 MR. KIRKPATRICK: And your Honor, its Bellar.

9 THE COURT: Bellar, okay I'm my apologies.

10 MR. KIRKPATRICK: Bellar, I'm sorry Bellar, it's
11 Bellar your Honor.

12 THE COURT: Let's try a third time. How do you
13 pronounce it sir?

14 MR. BELLAR: Bellar.

15 THE COURT: Bellar?

16 MR. BELLAR: It's Bellar, your Honor.

17 THE COURT: Good, okay. And then Mr. Somberg will
18 question on behalf of Mr. Morrison and then I have I -- I'm
19 assuming the primary attorney for Mr. Musico is Mr. Johnson.
20 From the attorney general's standpoint anything further, that
21 we need to discuss before we get into the first witness or is
22 anything else that you'd like to place on the record?

23 MS. DODDAMANI: Thank you your Honor, Sunita
24 Doddamani on behalf of the People as well as Greg Townsend
25 here Assistant Attorney General. Just that judge we -- we

1 order -- we had an order that we submitted to the Court which
2 myself as well as defense counsel, all three of them
3 stipulated to for certain protections for one of our
4 witnesses, and I'm asking the court to sign that order.

5 THE COURT: I have signed the order, I signed it on
6 March 1, the copy is in each file and if Lynn did her job
7 each of the defendants via attorneys should have a copy of
8 that order, and I appreciate the cooperation in that regard.
9 Mr. Kirkpatrick anything further?

10 MR. KIRKPATRICK: No your Honor, we're ready to
11 proceed.

12 THE COURT: And Mr. Somberg anything further before
13 we get started?

14 MR. SOMBERG: No, your Honor. We're ready your
15 Honor.

16 THE COURT: Ready okay. And Mr. Johnson?

17 MR. JOHNSON: Ready, your Honor.

18 THE COURT: Okay. Do you want to call your first
19 witness?

20 MS. DODDAMANI: Yes, your Honor, we'll call Agent
21 Henrik Impola. And your Honor as previously discussed I'm
22 going to stay at the counsel table then if that's all right
23 with the Court?

24 THE COURT: That's fine

25 MS. DODDAMANI: And be seated if that's all right?

1 THE COURT: That's fine.

2 MS. DODDAMANI: Thank you, judge.

3 THE COURT: Can you raise your right hand? Do you

4 swear or affirm to tell the truth, the whole truth, and

5 nothing but the truth?

6 AGENT IMPOLA: I do.

7 THE COURT: Have a seat. Please state your full

8 name for the record spelling your last.

9 THE WITNESS: Do you mind if I take off my mask?

10 THE COURT: You can, whatever's comfortable,

11 comfortable for you, you can take it off.

12 THE WITNESS: Thank you. Sure, my full name is

13 Henrik Impola- H-e-n-r-i-k I-m-p-o-l-a

14 THE COURT: Okay, go ahead.

15 MS. DODDAMANI: Thank you, your Honor.

16 AGENT HENRIK IMPOLA

17 (At 9:11 a.m., sworn as a witness, testified as

18 follows)

19 DIRECT EXAMINATION

20 BY MS. DODDAMANI:

21 Q. Good morning.

22 A. Good morning.

23 Q. All right, tell me your name one more time?

24 A. It's Special Agent Henrik Impola.

25 Q. Do you go by any other name?

1 A. I also go by Hank.

2 Q. Okay. And how are you employed?

3 A. I'm a special agent with the FBI out of our Flint Resident
4 Agency.

5 Q. Okay. How long have you been an FBI agent?

6 A. Approximately eleven years.

7 Q. And in that time tell me about the different units within the
8 FBI that you have worked in?

9 A. Sure. So for the entire duration of my career I've worked
10 counter terrorism investigations and then for about five
11 years I've also worked violent crimes against children cases
12 involving sex trafficking and pedophiles.

13 Q. Have you also any work in gangs?

14 A. I have.

15 Q. What is counter terrorism?

16 A. Counter terrorism is an FBI unit encompassing international
17 terrorism and domestic terrorism and it's basically to stop
18 political violence under the National Security side of the
19 house in the FBI.

20 Q. And what is domestic terrorism?

21 A. So domestic terrorism is political violence within the United
22 States and so there's no registered terrorists' organizations
23 by the State Department. It's basically homegrown actors who
24 decide to go against the government.

25 Q. Can that be individuals as well?

1 A. It can.

2 Q. Okay. What's your current in the Flint Residency of the FBI?

3 A. So I'm assigned to domestic terrorism investigations out of
4 Flint.

5 Q. And are you one of the lead case agents of this
6 investigation?

7 A. I am.

8 Q. What does that mean?

9 A. Well in the FBI a case agent is the equivalent to an OIC or
10 an officer in charge in state court, and so in this case that
11 means that I'm in charge of the Wolverine Watchman Terrorist
12 Enterprise investigation. So I'm the case agent to disrupt
13 and dismantle the Wolverine Watchman Terrorist Organization.

14 Q. Okay. And the two individuals seated at the Court table with
15 me here, what do they do?

16 A. So Special Agent Jayson Chamber is also a case agent with me,
17 we're partners and then a Detective Sergeant Brian Russell is
18 the Officer in Charge with Michigan State Police who is the
19 joint investigation we have with them.

20 Q. Thank you. Tell me about your training and experience
21 specific to domestic terrorism and militia extremism?

22 A. Sure. So I've received a standard FBI domestic terrorism,
23 international terrorism training, interrogation techniques
24 and I've worked terrorism investigations including militia
25 extremism for the last eleven years.

1 Q. Thank you. So tell me about what is the Wolverine Watchman?

2 A. Sure. So the Wolverine Watchman is a self-styled anarchist
3 militia.

4 MR. JOHNSON: Your Honor, I would object.

5 MR. KIRKPATRICK: I would echo that, your Honor.

6 THE COURT: Basis?

7 MR. KIRKPATRICK: Your Honor, first of all he's not
8 classified as an expert, he can't give an expert opinion.
9 Number two, lacks foundation, there's no facts in evidence to
10 support his opinion regarding the labeling of this particular
11 group as a terror; I was going to object earlier when he
12 called it a terrorist group. There's been no showing to this
13 court that it is a terrorist group, that's your decision to
14 make your Honor based upon the testimony.

15 MR. JOHNSON: Likewise your Honor, in Michigan law,
16 state law it's very clear. It's only been admission that the
17 State Department does not declare the Wolverine Watchman a
18 terrorist organization. So we would object at this point to
19 any classification by any witness, particularly a witness
20 testifying as a lay witness to the organization being a
21 terrorist organization.

22 THE COURT: Okay. In reference to your objection
23 about classification, I believe that it's necessary for that
24 type of classification to be generated by the State
25 Department for purposes of potentially being a terrorist

1 organization under state law. I do agree with the aspect of
2 the objection that at this point in time labeling Wolverine
3 Watchman, as a terrorist organization is a bit premature,
4 lacking foundation in terms of the facts upon which he bases
5 that. I suspect that ultimately, he may very well qualify as
6 an expert. So I will sustain the objection based on the
7 original -- original objection of Mr. Kirkpatrick.

8 MS. DODDAMAN: I'm going to ask some questions
9 judge.

10 THE COURT: Okay.

11 MS. DODDAMANI: To maybe lay a better foundation.

12 THE COURT: Yes.

13 MS. DODDAMANI: All right.

14 BY MS. DODDAMANI:

15 Q. Tell me what a militia is?

16 A. Sure. So a militia is a group of like-minded individuals who
17 will engage in paramilitary training and they do not have the
18 backing of any federal, state or local government.

19 Q. As part of your work in domestic terrorism do you investigate
20 terrorist's organizations?

21 A. I do.

22 Q. Do you investigate individuals --

23 A. Right.

24 Q. -- that commit things like terrorism?

25 A. I do.

1 Q. Okay. And the Wolverine Watchman, what is your basis of
2 knowledge about the Wolverine Watchman?

3 A. So my basis of knowledge is that I'm the case agent for the
4 Wolverine Watchman and that they're an organization designed
5 for political violence.

6 Q. Okay. Now you, you do terrorism enterprise investigations at
7 FBI, correct?

8 A. I do.

9 Q. And what does that mean, a terrorist enterprise
10 investigation?

11 A. Well terrorist enterprise investigation is a specific type of
12 investigation in the FBI in which we need to predicate an
13 entire organization based the fact that their mission is
14 violence. So we can't just investigate anybody, we can't
15 just invest, investigate any particular militia, but when we
16 submit to our legal department and to our lawyers in the FBI
17 they'll classify and entire organization as a terrorist
18 group, which will give us the legal ability to open
19 investigations and to move forward with investigative
20 techniques that the FBI has.

21 Q. Okay. And so did you open a terrorism enterprise
22 investigation on members of the Wolverine Watchman?

23 A. I did.

24 Q. Okay. So let me ask you, through your investigation did you
25 develop a familiarity with the voices and appearance of Joe

1 Morrison, Pete Musico and Paul Bellar?

2 A. I did.

3 Q. Do you see them in the courtroom today?

4 A. I do.

5 Q. Can you identify each one for me please?

6 A. Sure. Pete Musico is seated to, seated to the left; he's got
7 a black facemask with some type of white emblem on it. Joe
8 Morrison is seated in the middle and he's got an orange shirt
9 on, and then Paul Bellar is seated to the right with glasses
10 and a white shirt.

11 THE COURT: All three defendants have been
12 identified for purposes of preliminary examination only.

13 MS. DODDAMANI: Thank you. Thank you, your Honor.

14 (At 9:18 a.m., witness identified all three
15 defendants)

16 BY MS. DODDAMANI:

17 Q. What's your basis of knowledge about the Wolverine Watchman?
18 What sort of monitoring or what sort of things did you review
19 and/or information that you got that form the basis of the
20 opinions or the testimony you're going to give here today?

21 A. Well I was the primary source handler for an informant that I
22 recruited in the investigation and then I was also a case
23 agent for an undercover operation, we called undercover cold
24 snap, and as a result of those activities as well as physical
25 surveillance we monitored online communications and monitored

1 training. So that's a few of the things that led to a large
2 investigation that led to my basis of knowledge.

3 Q. Okay. And when did you open this investigation, can you give
4 me a date?

5 A. It was early April 2020.

6 Q. Okay. What can you tell me about the Wolverine Watchman in
7 relation to how the group functioned and recruited members?

8 A. Well initially they use social -- social media a lot,
9 Facebook, Instagram, and they would use Facebook as a means
10 of gathering members and recruiting. And then once they were
11 on Facebook they would push -- push members towards Wire,
12 which is an encrypted social media app., and then after they
13 Wire they would vet out the members and push them towards
14 tactical training exercises and in person meetings.

15 Q. Thank you. So just for the Courts benefit and for the
16 records benefit can you tell me about Facebook, how it works
17 with groups, and how this would be listed, what it looks
18 like? Give us some background on Facebook and how that
19 works?

20 A. Sure. So Joe Morrison and Paul Bellar were administrators of
21 the Facebook group page, which was used to spread propaganda
22 and recruit members, like-minded individuals.

23 Q. And how does Facebook work, how's it set up, how can you join
24 a group?

25 A. Sure. So to join a group the -- the Wolverine Watchman had

1 a, they had a mission statement and description of their
2 group and then you had to ask to join the group and then one
3 of the administrators had to let you into the group. Then
4 once you were in the group, you could see what's posted by
5 members of the group.

6 Q. Okay. And then you talked about a chat application called
7 Wire where you would join on Facebook, and then you get
8 transferred over to Wire. Tell me about Wire and what that
9 is?

10 A. Sure. So Wire is the app that you can get on your phone
11 through the app store. It's encrypted end-to-end generally
12 speaking so the government can't intercept those
13 communications, and Paul Bellar and Joe Morrison advertised
14 to the group that they'll be using Wire to communicate as a
15 group, and they would invite members to get on Wire. And
16 then from Wire they'd be further vetted.

17 Q. And would there be specific, does -- does Wirework like
18 Facebook? Are there pages of their group, like how do you
19 communicate?

20 A. So Wire is basically more like text messages so there's a
21 number of different text groups that you can put on and a you
22 can also upload videos and share pictures. You can also
23 ping, ping is a feature to get everybody's attention on
24 the app, and you can also share your location. There's an
25 ability to Geo locate a user through the app.

1 Q. Okay. So in March 2020, April 2020 this group comes to your
2 attention. We'll get into exactly how that happens but you -
3 - do you do some research on your own about these groups and
4 -- and Facebook and do you take a look at the group
5 description and things like that?

6 A. I do.

7 Q. Okay. So I'm going to ask you, you have a binder in front of
8 you and we made duplicates binders for everyone here so that
9 I'm not handing you things. But that binder is going to be
10 in front of you in about five seconds.

11 A. Thank you.

12 Q. Thank you. I'm going to ask you to turn to exhibit one?

13 A. Yeah, I've got it here.

14 Q. Okay. Can you tell me what that is generally?

15 A. Yes, this is a photograph of my informants' cell phone with
16 Facebook pulled up for the Wolverine Watchman, and it's got
17 the administrators of the Wolverine Watchman on it.

18 Q. Can you look at exhibit number two please and tell us general
19 what that is?

20 A. Sure. So exhibit number two is a photograph of my
21 informant's cell phone and it's a post by, on Facebook by
22 Paul Zacharias, which is an alias for Paul Bellar.

23 Q. Okay. And would you turn to number seven please, take a look
24 at that?

25 A. Yes, this is analysis I did on March 19th of the Wolverine

1 Watchman Facebook group page.

2 Q. When you say analysis what did you do and what's in here?

3 A. So I went on Facebook myself and I observed what was publicly

4 available to anybody else and I documented what I could see.

5 Q. And number seventeen contains a group description, is that

6 correct?

7 A. It does.

8 Q. Where'd you get that description?

9 A. That was on the Wolverine Watchman's profile page for their

10 group.

11 Q. Okay. Are these things, are these three things that we've

12 just reviewed, are they fair and accurate as to what they

13 purport to be?

14 A. They are.

15 Q. Okay.

16 MS. DODDAMANI: I'm going to move for their

17 admission at this time, judge?

18 THE COURT: One, two and seven, Mr. Kirkpatrick?

19 MR. KIRKPATRICK: No objection, your Honor.

20 MR. SOMBERG: No objection, your Honor.

21 MR. JOHNSON: No objection, your Honor.

22 THE COURT: Okay, one --

23 MR. DODDAMANI: Thank you.

24 THE COURT: One -- one two and seven are admitted.

25 (At 9:24 a.m., PX 1, PX 2, PX 7 admitted)

1 MS. DODDAMANI: And now that they're admitted judge,
2 I'm going to ask that they be displayed.

3 THE COURT: Okay.

4 BY MS. DODDAMANI:

5 Q. Okay. So on the screen behind you, that's exhibit number
6 one, can you tell us about that?

7 A. Sure. So this is a photograph of my sources phone and it's
8 got Paul Zacharias and Joe Morrison as administrators of the
9 Wolverine Watchman Facebook account.

10 Q. Through your investigation, the length of your investigation,
11 being many months, did you determine handles and screen names
12 for the three individuals seated in the courtroom today?

13 A. I did.

14 Q. Okay. And so who is Paul Zacharias and who's Joe Morrison?

15 A. So Paul Zacharias is Paul Bellar and Joe Morrison is using
16 his true name here Joe Morrison.

17 Q. Okay. And this is what time period you took this picture?

18 A. This is Mid-March of 2020.

19 Q. Thank you.

20 MS. DODDAMANI: Can you put up number two please?

21 BY MS. DODDAMANI:

22 Q. You can take a look at number two, tell us about this?

23 A. This is a Facebook post by Paul Bellar to members of the
24 Wolverine Watchman Facebook group.

25 Q. And what's significant about it?

1 A. Well he's giving directions to the group to go to Wire, which
2 is how we knew the group or we came to learn that the group
3 operated.

4 Q. Okay. And can you read the post please?

5 A. Sure. If you all are actually serious in this group, and
6 would like to be part of a -- the team instead of just being
7 on this Facebook group, please download the Wire app. We use
8 it for our group chats in the armory, medical and even memes.
9 Please message me or any other admin if you need help finding
10 the app. It works for any phone and so far, it's ran fine.
11 If you want to actually train and be prepared with the group
12 now would be a better time to start than never. We already
13 had a field-training day coming up this month. There's a
14 vetting process before getting into the actual group, as long
15 as you're cool, we're cool.

16 Q. And the date on this post when Paul Bellar made it?

17 A. That was March 6th, 2020.

18 Q. Thank you.

19 MS. DODDAMANI: Can you put up seven please?

20 BY MS. DODDAMANI:

21 Q. Okay. We're going to zoom in here so you can see better.

22 Okay, so this is the analysis that you mentioned earlier, is
23 that correct?

24 A. That's correct.

25 Q. Okay. And it had a group description and how did you get

1 this group description again?

2 A. I copied it from the Facebook profile.

3 Q. Okay. So, and the date on that, was that March 19th, 2020 as

4 noted?

5 A. That's correct.

6 Q. Okay. And can you read the description of the group please?

7 A. Sure. Wolverine Watchman is a group of patriots to network,

8 assemble and recruit like-minded individuals to develop

9 regional QRF's and squad tactics. Only people you trust, no

10 stated, no fudds, no bootlickers and no cops or feds. If

11 you're serious, get a Wire and message an admin your

12 username.

13 Q. And what about one of the rules in the group?

14 A. Group rules is Boojahideen only, no feds, statist cops,

15 bootlickers or commies or no ethonationalist.

16 Q. Okay. There's a lot of terms in here so I'm going to ask you

17 about those terms. The first one is can you tell me what it

18 means to develop regional QRF?

19 A. Sure. This was a goal of Joe Morrison, Pete Musico, a

20 regional QRF is group of operators who can respond if need be

21 to support each other, QRF stands for quick reaction force,

22 it's a military term, and the concept is in -- in a local

23 region you have other operators who can respond and support

24 you if needed tactically. So with weapons, with vests.

25 Q. Respond to what?

1 A. Well respond to contact with law enforcement if their rights
2 are getting fringed upon.

3 Q. Okay. And what are squad tactics?

4 A. Squad tactics is a reference to paramilitary training and
5 movement as a group to contact with law enforcement.

6 Q. Okay. And what does it mean to say add people you trust, no
7 statist?

8 A. The status are those who believe in a strong central
9 government and believe in government control over people's
10 everyday lives.

11 Q. What does it mean to say no fudds?

12 A. No fudds is a reference to casual gun owners, it's a playoff
13 of Elmer Fudd who is basically somebody who owns a gun but is
14 not tactically conditioned to be able to respond.

15 Q. What does it mean when it says no bootlickers?

16 A. Bootlickers is a derogatory reference to those who would be
17 subservient to law enforcement or the military.

18 Q. And no cops or feds?

19 A. Correct. That means no federal law enforcement officers or
20 state and local law enforcement officers.

21 Q. Okay. So under the rules where it says one of the Facebook
22 group rules is listed as Boojahideen only. What is
23 Boojahideen?

24 A. So Booja -- Boojahideen are warriors who are willing to
25 martyr themselves, it's a play off the term Mujahedeen from,

1 which I'm familiar with from Islamic terrorism. It's
2 basically somebody who's willing to die for the cause.

3 Q. And why is it called then instead of Mujahedeen why is it
4 called Boojahideen?

5 A. Well that's a play off the term Boogaloo, so Boogaloo is
6 something that the Wolverine Watchman subscribe to and
7 identified with.

8 Q. Okay. We're going to get into exactly what the Boogaloo
9 movement and ideology is in a moment. But what a -- these
10 other terms here, no feds, statist, cops, bootlickers,
11 commies.

12 A. That's a reference to communist.

13 Q. Thank you. And ethno-nationalist?

14 A. That's a reference to those who believe that your ethnicity
15 should be the basis of your nation. So white supremacy and
16 black separatist.

17 Q. Okay. So what --

18 MS. DODDAMANI: -- you can -- you can take that
19 down, thank you.

20 BY MS. DODDAMANI:

21 Q. What concerned you about the Wolverine Watchman enough to
22 open an investigation in this case?

23 A. Well initially the first concern we had was their willingness
24 to kill law enforcement and to prepare to kill law
25 enforcement pro-actively.

1 Q. And was this just talk, did they do anything else that
2 concerned you?

3 A. It was not just talk; they did a lot of training, planning
4 and preparation.

5 Q. Was there an attempt to maintain secrecy?

6 A. There was. All the defendants here seated today, Paul
7 Bellar, Joe Morrison and Pete Musico all preached operational
8 security so that law enforcement wouldn't be aware of their
9 plans.

10 Q. What is operational security?

11 A. It's a -- basically operational security is techniques and
12 tactics for communication to maintain a -- to not get on law
13 enforcements radar.

14 Q. All right. This is group ascribed to the Boogaloo movement,
15 isn't that correct?

16 A. That's correct.

17 Q. So can you tell me about what the Boogaloo movement is?

18 A. Sure. The Boogaloo movement is, Boogaloo is a term for a
19 civil war, which is complete collapse of society in which
20 anarchy rules.

21 Q. And what are the basic tenants and beliefs of the Boogaloo
22 movement?

23 A. Well the belief is that you have to prepare for it, and you
24 have to defend yourself proactively and be engaged in the
25 fight, and that the time is upon us --

1 Q. The fight, the fight against who?

2 A. The fight against the government.

3 Q. And why?

4 A. Well because in a complete collapse of society everybody will

5 need to defend themselves.

6 Q. Okay.

7 A. And the government will be trying to maintain control of you.

8 Q. Okay. You talked about the idea that this is a civil war and

9 what's meant by that?

10 A. Well as the defendants describe it, you'll be fighting

11 against your fellow citizens, some of them who are fudds or

12 bootlickers or preppers or you'll basically be engaged in

13 combat against those who don't believe the same as you.

14 Q. Does the FBI classify this as an extremist ideology?

15 A. Yes, it does.

16 Q. And how do you know the information that you're giving us

17 today about Boogaloo?

18 A. Well through my training and experience through what I know

19 about domestic terrorism and then primarily through

20 monitoring this group for the last seven months it's been a

21 frequent topic of discussion.

22 Q. Does the Boogaloo movement advocate for violent felonies?

23 A. It does.

24 Q. Does the Boogaloo movement violate a --

25 MR, KIRKPATRICK: Your Honor, I guess I'm going to

1 object only for purposes of is this an educational lesson
2 here or is this pertaining to our actual clients. There's
3 been a -- and I understand the court needs to be educated on
4 what's going on and I understand the parameters of that, but
5 for the record I want to make sure it's clear are we getting
6 a lesson in what this is all about or is this actually
7 relevant to our clients, and actions they actually did? And
8 that's my concern, we're getting this generalization and I
9 want to make sure that we're actually talking about our
10 client, and not what these terms mean in general -- general
11 terms?

12 MS. DODDAMANI: I'm getting there judge, I just, I'm
13 trying to lay a foundation at this point.

14 MR. KIRKPATRICK: As long as the records clear that
15 up to this point this is all-educational for the court, then
16 I -- that's my objections so the records clear on the
17 testimony.

18 THE COURT: I --

19 MS. DODDAMANI: Educational and that I'm laying a
20 foundation, judge.

21 THE COURT: Well I -- number one I need education; I
22 always need education so there -- there's not a problem with
23 that. There's already been testimony that the Wolverine
24 Watchman ascribed to the tenants of Boogaloo, and I suspect
25 we're going to be getting into the actions or alleged actions

1 of the Wolverine Watchman and in order to, shall I say
2 understand the intent of those actions I think that
3 understanding a philosophy to which apparently, it's alleged
4 the defendants ascribed to I think is an appropriate area of
5 inquiry. Plus in addition to that, I need to be educated.

6 MS. DODDAMANI; Thank you, your Honor.

7 THE COURT: Thank you.

8 BY MS. DODDAMANI:

9 Q. Does the Boogaloo advocate for violent felonies that are
10 dangerous to human life?

11 A. Yes, it does.

12 Q. Is the Boogaloo politically motivated?

13 A. Yes, it is.

14 Q. Okay. And are there visual images associated with the
15 Boogaloo?

16 A. Yes, there are.

17 Q. Tell me about those?

18 A. Well one of them is an igloo with -- and the term big igloo
19 is a play-off of the term Boogaloo. It's a way to talk about
20 it without being censored online or the government knowing.
21 There's also Hawaiian shirts, and they also refer to it as
22 the big luau, which is another play off term, the term
23 Boogaloo.

24 Q. Hawaiian shirts?

25 A. Yes.

1 Q. And Hawaiian patterns?

2 A. Correct, flower patterns.

3 Q. Okay.

4 A. That's a -- a mockery of the uniform worn by redcoats, which
5 is what the Boogaloo movement views the government as
6 redcoats or Nazi's. So they like a mock of the government
7 uniform.

8 Q. Okay. Now do they -- do -- does the Boogaloo movement
9 ascribe to sort of the American Revolution or anything
10 related to the founding of this country?

11 A. Yeah so, the -- the Boogaloo would heavily recruit from what
12 they call constitutionalist, which are those and they refer
13 to the founding fathers and then they'll base of their
14 ideology on what they believe the founding fathers wanted for
15 the United States.

16 Q. Thank you. So based on your monitoring and in the course of
17 this investigation did the three individuals seated in the
18 courtroom today ascribe to the Boogaloo ideology and tell me
19 how you know that?

20 A. Sure. So I'll go through them one by one. So Pete Musico
21 ascribed to Boogaloo ideology, he stated numerous times that
22 he was ready for the Boog to happen and he was ready to die
23 for it.

24 Q. What's the Boog?

25 A. The Boog is, I'm sorry, its short for Boogaloo so it's a

1 slang reference that they would use often during training,
2 and communication.

3 Q. Is the Boogaloo --

4 THE COURT: I apologize to everyone, apparently my
5 mike is not working and a I've been advised that they need to
6 take a break to hopefully remedy the situation, so.

7 MR. BURNS: All the other testimony has been heard,
8 it's just that your mike, we can barely hear it, but it's not
9 enough for what we need it to be.

10 THE COURT: The recordation okay. How much time do
11 you think you need?

12 MR. BURNS: I hope just very briefly.

13 THE COURT: Maybe ten minutes?

14 MR. BURNS: That would be perfect.

15 THE COURT: Okay. I -- I'm sorry folks but
16 technical glitch.

17 (At 9:37 a.m., recess)

18 (At 9:47 a.m., back on the record)

19 THE COURT: Sorry about that, do we have, oh wait me
20 need Mr. Johnson. Okay, we're fine -- we're back on the
21 record, I interrupted the testimony of our first witness, go
22 ahead.

23 MS. DODDAMANI: Thank you.

24 BY MS. DODDAMANI:

25 Q. I would, sorry, you hear me okay?

1 A. I can.

2 Q. All right. I was asking you about sort of the ideology of
3 the Boogaloo. Can you tell me whether there's any sort of
4 racial component to any of the ideologies or basic tenants or
5 beliefs the Boogaloo?

6 A. Not for the Wolverine Watchman, some other groups might have
7 different beliefs as I reference the Boogaloo, which is
8 commonly known you know throughout the United States. But
9 for the Wolverine Watchman they definitely didn't have any --
10 encouraged diversity and there was no racial component.

11 Q. Okay. But other aspects, other -- other Boogaloo groups or
12 other members of the Boogaloo movement is there any
13 correlation with -- with the racial component?

14 MR. JOHNSON: Your Honor, I would object to this
15 answer, it's not relevant what other groups do. We're here
16 for the Wolverine Watchman and its undo and prejudicial even
17 at exam to talk about any other group's racial beliefs.

18 MS. DODDAMANI: I'm asking about the principals of
19 the Boogaloo movement judge and he has been clear that it's
20 not particular to this group, but if there are various
21 flavors of the Boogaloo, movement the court should understand
22 that.

23 THE COURT: Well I don't think I -- I really need to
24 hear that if they subscribe to tenants of the Boogaloo
25 movement, I'd like to hear about the tenants that they do

1 subscribe to.

2 MS. DODDAMANI: Okay.

3 THE COURT: But as Mr. Johnson indicated, I don't
4 need to hear what they don't subscribe to.

5 MR. DODDAMANI: Okay, thank you judge.

6 THE COURT: Okay.

7 BY MS. DODDAMANI:

8 Q. And then Agent Impola before the break I was asking you know
9 based on your monitoring of the three individuals in the
10 courtroom today that you identified do they ascribe to the
11 Boogaloo ideology and how do you know this?

12 A. Sure, and yes they do subscribe to the Boogaloo ideology. If
13 I go by them, one by one so Pete Musico pushed a lot of
14 Boogaloo propaganda and said himself personally that he was
15 willing to be a martyr for the cause. Joe Morrison was the
16 leader of the group who created the Wolverine Watchman and
17 pushed a lot of the Boogaloo propaganda as a way of
18 recruiting and building the group, and Paul Bellar himself
19 said he was willing to fight and die for the Boogaloo, and
20 also pushed a lot of propaganda of the recruit members of the
21 Wolverine Watchman.

22 Q. And so generally would you classify as the Boogaloo as an
23 anti-government, anti-law enforcement type of movement?

24 A. Yes, I would.

25 Q. Now you said that you monitored these individuals'

1 communications, is that correct?

2 A. That's correct.

3 Q. Okay. And so I'm going to ask you to look at exhibit folder,

4 all of the things marked three with the letters, four, five

5 and six. Its considerable amounts so I want you to just

6 thumb through them all, and then I'll ask you some questions.

7 A. So I've got exhibits three, four, five and six in front of me

8 here.

9 Q. Okay. And you previously viewed these, is that correct?

10 A. I have.

11 Q. Okay. Tell me generally, what they are?

12 A. This is generally propaganda pushed online to recruit members

13 of the Wolverine Watchman, and then to maintain control of

14 their own group and push the agenda they have political

15 violence.

16 Q. Is this all of the things that they posted?

17 A. No, it's not.

18 Q. And where do you get these things?

19 A. These things are from Facebook and Wire.

20 Q. And how do you get them?

21 A. Well Facebook I swore out search warrants and I received

22 information from Facebook as a result of those -- of those

23 search warrant. I also observed things that were publicly

24 available online, and for Wire, I maintained access to my

25 sources Wire account in which he was a member of the group.

1 And so we had a chance to monitor the group's internal
2 communications.

3 Q. Okay, thank you. And we'll get into that a little bit
4 further, but I am going to -- are -- are all of these
5 accurate as to -- so section three is the ones that you have
6 for exhibit three, all A through, exhibit three, A through I.
7 Are -- what are those, the first set?

8 A. So A through I, these are propaganda, memes, photographs that
9 were pushed out on the Wolverine Watchman group Facebook
10 page.

11 Q. Okay. And then what about exhibits and labeled as four, A
12 through T?

13 A. So exhibits four, A through T, those are photographs, memes,
14 propaganda pushed out by Joe Morrison on his personal
15 Facebook page.

16 Q. Thank you. And number five, five A through I?

17 A. So five, A through I is memes, photographs and propaganda
18 pushed out by Pete Musico on his personal Facebook page.

19 Q. Okay. And then we took out five G is that correct because it
20 was a duplicate? So with the exception of five G?

21 A. That's correct.

22 Q. Five A through I is all that you just testified to, correct?

23 A. That's correct.

24 Q. And what about exhibit in six, six A through V?

25 A. Six A through B is from Paul, their memes, propaganda and

1 photos from Paul Bellar's Facebook page.

2 Q. And are they fair and accurate as to the search warrant
3 returns, and the monitoring that you did of these
4 individuals?

5 A. They are but I do want to say that one of the images on Joe
6 Morrison's page is actually from Wire, it wasn't from
7 Facebook. So I didn't want to categorize them all and then
8 another image is also on the Wolverine Watchman Facebook page
9 is also from Wire, so from Wire as well.

10 Q. Okay, thank you.

11 MS. DODDAMANI: So at this point, judge I'm going to
12 move for the admission of the series of exhibits labeled
13 number three, four, five and six.

14 THE COURT: Mr. Kirkpatrick?

15 MR. KIRKPATRICK: Your Honor I'm not objecting to
16 them, but I would like to ask just a clarification or a
17 little voir dire of the witness before they are admitted if
18 the court would allow me to do so?

19 THE COURT: And I guess you're standing up Mr.
20 Johnson?

21 MR. JOHNSON: No I -- I was communicating to Mr.
22 Kirkpatrick I think what Mr. Kirkpatrick for is agreed by
23 everybody, so I don't have anything additional.

24 THE COURT: A Mr. Somberg?

25 MR. SOMBER: I agree your Honor.

1 THE COURT: Okay. Any response?

2 MS. DODDAMANI: I, I don't have a problem with them
3 asking questions for clarification. I know it's a big bulk
4 of material and my plan judge was to admit it in bulk and
5 then go through each one with it on the screen.

6 THE COURT: Certainly, given -- given the nature of
7 the circumstances, and the bulk of materials I think voir
8 dire is appropriate.

9 MR. KIRKPATRICK: It will be brief your Honor.

10 THE COURT: But it's not going to morph, it's not
11 going to morph into a cross-examination.

12 MR. KIRKPATRICK: No your Honor, absolutely not.

13 THE COURT: Okay.

14 MR. KIRKPATRICK: I promise the Court it will be
15 very brief. Agent, am I saying Impola?

16 THE WITNESS: Impola.

17 VOIR DIRE

18 BY MR. KIRKPATRICK:

19 Q. Impola, the memes -- the memes that you took off of Facebook
20 from the parties you don't have any knowledge as to whether
21 or not any of the three defendants actually created those
22 memes correct? I'm not talking about the ones with their
23 photographs in it.

24 A. Sure, yeah, generally speaking I don't know how the memes
25 were created.

1 Q. Okay. You would agree that those memes have been on many
2 computers and many Facebook pages, not just theirs.

3 Q. Well there's a portion of memes that are specific to the
4 Wolverine Watchman, but for the general ones they, like you
5 said aren't specific to the Watchman. There's, they could be
6 from anywhere and they could be you know all over the
7 internet.

8 Q. And with the exception of the ones that you eluded to that
9 you found directly off Mr. Musico, Mr. Morrisons' Facebook,
10 you're not certain who actually posted, actually posted those
11 memes to that website, correct?

12 A. Well for each individual meme you know I could go back to the
13 Facebook return and see who posted each particular one.

14 Q. Okay.

15 A. But where it originated elsewhere on the internet like you
16 posted it first, I don't know if that's the spirit of your
17 question, I don't know that.

18 Q. Okay. So these could have came from other sources and then
19 they just put them on their Facebook page, correct?

20 A. Correct.

21 MR. KIRKPATRICK: With that your Honor, I have no
22 objection to the admissions.

23 MR. SOMBERG: No objection, your Honor.

24 THE COURT: Mr. Johnson?

25 MR. JOHNSON: No objection, your Honor.

1 THE COURT: Okay. Four through six inclusive
2 admitted.

3 MS. DODDAMANI: Three through six judge?

4 THE COURT: I'm sorry.

5 MS. DODDAMANI: Thank you.

6 THE COURT: Three through six inclusive.

7 MS. DODDANANI: Thank you.

8 (At 9:56 a.m., PX 3, PX 4, PX 5 inclusive admitted)

9 BY MS. DODDAMANI:

10 Q. All right. So now, I'm going to publish them and I want you
11 to tell me about some of these. So we're right now in folder
12 three, if you can put three A up and you had previously
13 testified that this is from the Wolverine Watchman Facebook
14 page, is that correct, that's the group page?

15 A. That's correct.

16 Q. Thank you. Tell me about this one?

17 A. Sure. So this is a memes of Governors Whitmer that says how
18 can I screw Michiganders today brought to you straight from
19 the communist playbook, and this was posted on November 26th
20 of 2019.

21 Q. Thank you. Three B, please?

22 A. This is another meme of Governor Whitmer. It says I'm going
23 to take you Second Amendment; I'm going to take your guns
24 with red flag laws.

25 Q. What are red flag laws?

1 A. Red flag laws are gun laws designed to pre-empt violence and
2 identify violent indicators. So it's some -- it's something
3 that the Boogaloo is afraid of, it; it's a removal of civil
4 liberties that they're adamant about fighting the government.

5 Q. Okay. Are red flag laws like when a -- a state has laws in
6 place that they, that the Court or police can take guns
7 before you're convicted of a crime? Is that your
8 understanding of what the Red Flag laws are?

9 A. Yeah, it's a way of legally removing access to firearms and
10 through state law, which Michigan does not have any state
11 red, state red flag laws, other states do.

12 Q. Okay, thank you. Three C please. Tell me about that?

13 A. Sure. So this is a meme, it said ain't no party like a red
14 tag -- red flag party and it's got a grenade attached to a
15 door handle and it says them. You should really stop making
16 Boogaloo memes to avoid trouble.

17 Q. What does this mean?

18 A. This is making fun of law enforcement responding to Boogaloo
19 members and what might happen if we open the door.

20 Q. And what might happen?

21 A. You might, we might be killed with a grenade.

22 Q. Thank you. Three a, sorry, three D please, what's this?

23 A. This is a meme, which has on the top an imagery from the
24 American Revolution, which says we did it before and then it
25 had an imagery from a modern militia and it says we'll, we

1 will do it again.

2 Q. Okay. Three E please.

3 A. This is an image that's common in the Boogaloo movement, it's
4 got the igloo, which is a symbol of the Boogaloo movement,
5 and then it calls out law enforce or victims who have been
6 killed at the hands of law enforcement that are -- this is
7 used for recruiting for the Boogaloo, and then it's got the
8 Hawaiian shirt as the stripe which is another reference to
9 the Boogaloo.

10 Q. So we see and igloo in the top left corner right, is this
11 supposed to mimic a flag?

12 A. Yes, so this entire meme here or propaganda, whatever you
13 want to call it, yes it mimics the American Flag, and it says
14 come and start it.

15 Q. And what is come and start it?

16 A. That would be the Boogaloo.

17 Q. Okay. And there's a lot of names here, his name was, his
18 name was, his name was, a lot of that and those individuals
19 that are listed there, what -- what is, what -- what's the
20 reference here?

21 A. These are individuals who've been killed by law enforcement,
22 they believe assassinated or killed unjustly, and that's
23 particular grievance they use to recruit members to their
24 cause.

25 Q. Thank you. Could you put up three F please, what's this?

1 A. This is a meme of Governor Whitmer wearing a German military
2 hat, it says meanwhile in Michigan Herr Gretchen Whitmer.
3 Q. And what's this a reference to?
4 A. This is a reference to Gretchen Whitmer being a communist and
5 as -- as in Nazi Germany.
6 Q. Thank you. Three G please, what's this?
7 A. This is a rebel flag with an AR rifle, and it says come and
8 take it.
9 Q. And what's this?
10 A. This is a reference to the civil war and how basically to
11 recruit members to the Boogaloo. It means basically fighting
12 against the government.
13 Q. Thank you.
14 A. Fighting against the man.
15 Q. Three H, what's this?
16 A. It's an American Flag upside down symboling distress.
17 Q. Distress, what do you mean?
18 A. Meaning the country and citizens of the United States are in
19 distress and need help.
20 Q. And that's why it's -- that's why the flag is inverted?
21 A. Yeah, it's inverted, upside down and it says in dire
22 distress.
23 Q. Thank you. Three I please, what's this?
24 A. This is a meme specific to the Wolverine Watchman or I don't
25 know if you call it a meme, but its propaganda. It's a

1 photograph from an April 15th rally they attended at the
2 Capital and it's got their caption, it says Wolverine
3 Watchman, Liberties last line of defense from tyranny, join
4 us today.

5 Q. Are any of the three defendants in the courtroom in -- in --
6 photographed here?

7 A. They are, Pete Musico and Joe Morrison are photographed
8 there.

9 Q. And can you tell us what, like what position they are in?

10 A. Sure. As I face the screen, Pete Musico is on the right with
11 a gray ball cap and a rifle slung in front of him. And Joe
12 Morrison is the third from the right wearing a Hawaiian shirt
13 and ballistic armor with a rifle pointing down in front of
14 him.

15 Q. Thank you. I'm going, want to talk now about the series that
16 are labeled exhibit four and who's -- who's post are these in
17 this grouping?

18 A. These are Joe Morrison's personal Facebook posts with the
19 exception of O, that is a Wire post.

20 Q. Thank you. So could you put four A please, tell me about
21 that?

22 A. This is propaganda specific to a rally the Wolverine Watchman
23 attended in April. It says we will not be silenced, we will
24 not back down, we will not comply. We the People are pissed
25 off and it's got the Wolverine Watchman with other militia

1 members in, on the Capital steps in front of a recall Whitmer
2 sign.

3 Q. Are there any of the three defendants in the courtroom today
4 in this photo?

5 A. There are.

6 Q. Can you tell us?

7 A. Sure. On the left side of the screen on one knee is Joe
8 Morrison holding a rifle across his knee, and then on the
9 second from the right is Pete Musico with his rifle indexed
10 in the air.

11 Q. Okay, thank you. Can you put up four B please, tell us about
12 that please?

13 A. Sure. This is another photograph used as propaganda and it
14 says Wolverine Watchman, Michigan's defense. Pete Musico is
15 on the far right with his rifle indexed in the air. Joe
16 Morrison is second from the right with his rifle indexed
17 towards the ground.

18 Q. Where's this picture taken, if you know?

19 A. I'm not exactly sure, I think it's around the Capital; it's
20 at one of the protests around the Capital.

21 Q. Thank you. I'm going to ask for four C to be displayed
22 please, what's this?

23 A. This is a propaganda image referencing your local Boojahideen
24 so a -- a warrior who's willing to martyr himself, asking for
25 public support.

1 Q. Thank you. Four D please, this are all still Joe Morrison's
2 Facebook, Facebook posts, correct?

3 A. This is, yes.

4 Q. Thank you, and tell us about four D?

5 A. Sure. So this includes a don't tread on me snake which is a
6 symbol of the American Revolution used to fight against the
7 corrupt government, and it's got a -- a statement about the
8 Boogaloo on it.

9 Q. And a can you read it, I'm sorry?

10 A. Sure. The time has come to take our arms and resist. What
11 hurts the most is you call terrorist, but before you do stop
12 so you may know that we see a sickness and like a plague it's
13 spreading. We don't like the direction our country is
14 heading. The day we fight for liberty, we are dreading, but
15 the state of our country is hella unsettling. We will not be
16 ruled from someone who sits on top a throne using our tax
17 money blowing up kids with a drone. An oil barrel marks the
18 grave instead of a stone, cops have stolen caged, and killed
19 so many they can never atone. All we want was peace of
20 family and a home but these commies, tyrants, and jackboots
21 couldn't, and they used the F word there, leave us alone. We
22 are Boojahideen those who take arms and resist, but before
23 you call us terrorist know that it's because your complacency
24 allowed this.

25 Q. Okay. So if there is any expletives or swearing, I'm going

1 to ask you to read those in full, as we have to make a clear
2 record.

3 A. Sure.

4 Q. So just for the coming further. Okay. And a four E please,
5 what's this?

6 A. This is Joe Morrison's patch.

7 Q. And what's that patch?

8 A. That is a Boogaloo patch; it's got the igloo with the
9 Hawaiian shirt going through it on -- on the center of
10 American flag.

11 Q. Thank you. Four F please, what is this?

12 A. This is a Facebook post by Joe Morrison.

13 Q. And what, what -- what's important about it?

14 A. Well it's a statement of his interpretation of the Boogaloo.

15 Q. Okay.

16 A. I'll read it.

17 Q. Please do.

18 A. It says is this how liberty goes out with thunderous,
19 applause and a whimper. Shall we roar like lions for liberty
20 or bleat like sheep for security and comfort? The republic
21 is in danger. President Trump is proving himself no friend
22 of the constitution as he continually violates our God given
23 rights. Shall we let him rule with a pen as if some king or
24 shall we fight? Patriot's time is fleeting, if we do not act
25 too and our rights shall perish. Shall we live on our knees

1 or die on our feet. Ask yourself is security in my time worth
2 tyranny for my children. Ask for me the republic is worth
3 fighting for. In the words of Patrick Henry "Give me liberty
4 or give me death".

5 Q. And when was this posted?

6 A. I'm sorry which exhibit is this?

7 Q. This is four F.

8 A. So this was posted on June 6th, 2019.

9 Q. Thank you. Okay, four G please, what is this?

10 A. This is a screen capture of photograph from Joe's Facebook
11 account with the definition of Boogaloo.

12 Q. And what is the definition of Boogaloo here?

13 A. Well as it's here it says a common, a common libertarian meme
14 or reference the over throwing of a government or
15 authoritarian force by armed revolution. This can also be in
16 regard to a societal revolution whereby the citizenry of the
17 United States become aware of the reality of certain
18 political topics or are "redpilled", rather than using their
19 preconceived emotions to form an opinion on those specific
20 political topics.

21 Q. What does red pills mean?

22 A. Redpilled is a reference to the matrix in which you can take
23 a red or blue pill and if you take one your eyes will be open
24 and if you take the other, you'll be oblivious to what's
25 going on around you.

1 Q. Okay. Four H please, tell us about this.

2 A. This is a screen capture of Joe Morrison's, statement made by
3 Joe Morrison on Facebook.

4 Q. Tell me about it?

5 A. Joe Morrison stated if you pussies want to do shit join us or
6 be complacent, up to, I don't care you all were begging a few
7 weeks ago for a shut down and now you're crying. Anyway, we
8 want to restore the republic and true liberty. If you're
9 about that life come on over to the Wolverine Watchman and
10 come train and get ready to have fun bitch -- and get ready
11 if not have fun bitchin on Facebook. You all don't like my
12 language I'm sorry, I'm tired mostly, tired of you all, who
13 all, and then it cuts out.

14 Q. Okay. Four I please, what's that?

15 A. This is an emblem with an igloo representing the Boogaloo and
16 this was ultimately a profile picture on Joe Morrison's
17 Facebook background as well as one of his other Facebook
18 accounts he ran which is a group blog called funding Bunyan
19 Boojahideen.

20 Q. Okay. And that the Hawaiian print, is that correct?

21 A. It does, it's got the Hawaiian print in the background it
22 says Boogaloo and then one of the slogans there is Cowabunga
23 it is.

24 Q. Okay. You, oh I'm sorry you said that -- that Joe Morrison's
25 Facebook account, he had an account called what?

1 A. Bunyan Boojahideen.

2 Q. And what is that?

3 A. A Bunyan is an alias used by Joe Morrison that he got from
4 his family and Bujahideen as I've talked about previously is
5 a reference to a -- a martyr for the cause of the Boogaloo.

6 Q. Okay, thank you. Four J, what's this?

7 A. This is a propaganda picture from April 15th, says Michigan
8 Gestapo police harass and collect, comply or die.

9 Q. Thank you. Four K, this?

10 A. This is a screen capture of President Trumps tweet on April
11 17th calling to Liberate Michigan.

12 Q. And this, why is it the screen cap -- who -- who screen
13 captured this or what was the context of this?

14 A. Well I'm not sure who screen captured it, but Joe Morrison
15 posted it on Facebook to his followers.

16 Q. And when did he do that?

17 A. That was shortly after it was posted on April 17th, 2020.

18 Q. Shortly after what was posted?

19 A. Shortly after President Trump tweeted this.

20 Q. Thank you. Four L please, tell me about this?

21 A. This is another post that Joe Morrison made shortly after
22 President Trumps tweet. It says as does the snowfall so
23 shall tyranny, liberate Michigan and it's a photograph of Joe
24 Morrison.

25 Q. Thank you. Four M please, what's this?

1 A. This is a meme, it says we are Duncan Lemp who's considered a
2 martyr of the Boogaloo movement, one of the original martyrs
3 and then it says we are the Boojahideen.

4 Q. And what is -- what is -- whose picture is that?

5 A. That's Joe Morrison.

6 Q. And what does it say on his picture?

7 A. It says incoherent Boogaloo noises.

8 Q. Okay. Four N please, what's this?

9 A. This is an Instagram post from Joe Morrison, which was shared
10 on Facebook. A Joe Morris --

11 Q. Tell me about it? I'm sorry, tell me about it?

12 A. Sure. Joe Morrison uses the Instagram handle Boogaloo
13 Bunyan, and he states one, two I'm coming for you, three,
14 four better lock your door at G.E. Whitmer, which is Governor
15 Whitmer. Pound Boogaloo, pound Boojahideen, pound Boogaloo,
16 pound big igloo, pound big luau, pound send bachelors and
17 come heavily armed, pound send your goons bitch.

18 Q. Okay. Four O, tell me about that?

19 A. So this is a Wire post, it's the only one among these that's
20 not from Facebook, and this is a meme which has a powering
21 evil figure cartoon with the name Boogaloo Bunyan, which is
22 Joe Morrison's alias and another warrior with a sword which
23 says Governor Whitmer's head on a platter and the warrior is
24 the Great Lakes State Boojahideen.

25 Q. Thank you.

1 A. And it's spelled Boojahideen.

2 Q. Okay. I'd like to talk about the exhibits labeled in number
3 five, and you had previously identified these as Pete
4 Musico's posts and communications, correct?

5 A. That's correct.

6 Q. I'm sorry there's a couple in four that I still need to
7 finish up, I apologize. Okay, so this one, its four P
8 please, tell me about this?

9 A. This is a, a meme which says the original Boog boys, Bo is
10 short for Boogaloo, and it says yeeting filthy red coats and
11 it's got the kind of blurred out picture of what -- what
12 looks like American Revolutionist.

13 Q. What is yeeting filthy red coats?

14 A. Yeeting is a term that Boogaloo members used a lot. It's
15 basically kind of like squatting up or ganging up on filthy
16 red coats, which is the government. It's a reference to --

17 Q. The British.

18 A. -- the British from the American Revolution comparing us or
19 myself and the government to the British.

20 MR. KIRKPATRICK: Well I guess your Honor, I'm not
21 objecting to these exhibits coming in, I am -- I am objecting
22 to him, the witness speculating on whether it means the red
23 coats or whether it means the government. I don't think he
24 is an expert on these memes, and I let a lot of them go your
25 Honor, but I -- he can testify to what the exhibit is, but

1 unless he has personal knowledge or further knowledge about
2 what the memes mean then I don't think he's the proper person
3 to testify to what they mean. It -- it says red coats.

4 MS. DODDAMANIN: These are terms judge, and we're trying
5 to clarify the terms for purposes of understanding the
6 exhibit. And he has knowledge of this because of eleven years
7 of domestic terrorism investigations.

8 THE COURT: Given this man's experience, more
9 specifically eleven years, looking at this stuff, the
10 variations thereof I think that he can explain if he has an
11 understanding of what these terms, I -- I -- probably slang
12 term isn't the appropriate name, but if he, if he's a
13 familiar with them I think he can testimony relatively, or
14 relative to the saying. However, I would ask the attorney
15 general some of these memes are I -- I think self-
16 explanatory.

17 MS. DODDAMANI: Okay.

18 THE COURT: And so I -- if you can move -- move a
19 little quicker that'd be great.

20 MS. DODDAMANI; Thank you judge.

21 BY MS. DODDAMANI:

22 Q. Could you tell us what Boog boys is?

23 A. Sure. It's a reference to adherence to the Boogaloo.

24 Q. Thank you. Four Q please?

25 A. This is a meme that says every blade of grass is -- behind

1 every blade of grass is an American rifleman and it includes
2 the phrase Morte Semper Tyrannis, resist or die.

3 Q. And what does Morte Semper Tyrannis mean?

4 A. That means death to all tyrants, it's a Latin phrase used in
5 Europe.

6 Q. Thank you. Four R please, what's this?

7 A. This is a meme from Waco Texas, and it say just following
8 orders, I don't make the laws just violently enforce them.

9 Q. Okay. Four S please, what's this?

10 A. Similar meme from Waco Texas and it says FBI, HRT, domestic
11 terrorist.

12 Q. What is FBI HRT?

13 A. HRT is the Hostage Rescue Team, which is the FBI's highest
14 elite SWAT team.

15 Q. Thank you. Four T please, what's this?

16 A. This is a meme where four ATF agents who were killed in Waco
17 Texas and it's a reference to the movie Joker; it says you
18 get what you fuckin deserve.

19 Q. Okay. I'm going to switch over to five, this is Mr. Musico's
20 communication, is that correct? I'm going to ask for five A.

21 A. Yes, that's correct.

22 Q. Tell me about five A?

23 A. Sure. This is propaganda for the Wolverine Watchman, it says
24 Wolverine Watchman we will take it back wait and see.

25 Q. Five B, what is this?

1 A. It's an American flag with a thin blue line; it means being
2 stripped back revealing Nazi symbol.

3 Q. What is the thin blue line mean in this?

4 A. Thin blue line represents American Law Enforcement.

5 Q. And so, its peeling back American law enforcement and there's
6 a Nazi sign behind it?

7 A. Yes, it's equating the police and law enforcement in the
8 United States to Nazi's.

9 Q. Thank you. Five C?

10 A. This is a meme which said had a hard day at work; we'll go
11 home and beat your wives like we do. It's a photograph of
12 law enforcement officers.

13 Q. Five D, what's this?

14 A. This is propaganda with the original don't tread on me flag,
15 and it references the Culpepper Minute Men, which is the
16 original militia, which used the don't tread on me propaganda
17 against the British government during the American
18 Revolution.

19 Q. And these are all Pete Musico's post, is that correct?

20 A. That's correct.

21 Q. Five E please.

22 A. This is a meme with Governor Whitmer and her head replacing a
23 Nazi leader head, which says Fuhrer Michigan.

24 Q. Five F please?

25 A. This is propaganda with the American flag dripping from a

1 bullet that says by bullet or ballot restoration of the
2 republic is coming.

3 Q. Five H please, what's this?

4 A. This is Pete Musico's kit, it's his --

5 Q. What is kit?

6 A. It's plate carrier and, and his carrier is what surrounds his
7 ballistic armor.

8 Q. What's a plate carrier, sorry I -- you said that kind of have
9 to explain?

10 A. Yeah, no problem. Basically, it's his ballistic armor that
11 he wears to protect his body from bullets.

12 Q. Okay. And is that like a -- is that in like a vest form?

13 A. Yeah, the vest is the plate carrier.

14 Q. Okay. And what's significant about the patches?

15 A. He's got the Wolverine Watchman patch; he's got the American
16 flag upside down symbolizing distress. He's identifying
17 himself as an infidel and then he's got a cannon, which says
18 come, and take it.

19 Q. Thank you.

20 MS. DODDAMANI: Before you put five I, your Honor
21 there are a -- a few exhibits that has some sensitive
22 information, I've talked to counsels about this, and we
23 requested and we had requested and I've worked with your
24 court staff yesterday that they would turn off the camera for
25 you tube for a couple of specific exhibits because the

1 sensitive information contained on them. So I'm asking the
2 Court to do that now just for this one and then we can turn
3 it right back on after that.

4 UNKNOWN MALE: Keep the audio going.

5 MS. DODDAMANI: But we would keep the audio going
6 for the you tube stream judge for the Court to be open.

7 THE COURT: Mr. Kirkpatrick?

8 MR. KIRKPATRICK: I have no objection, your Honor.

9 MR. SOMBERG: No objection, your Honor.

10 MR. JOHNSON: No objection, your Honor.

11 THE COURT: Okay, thank you.

12 MS. DODDAMANI: Thank you.

13 THE COURT: Okay. Lynn shut the -- shut the you
14 tube off and --

15 MS. CAVANAUGH: I'll leave the you tube up; I'm just
16 going to stop the video.

17 MS. DODDAMANI: Thank you.

18 THE COURT: Okay.

19 BY MS. DODDAMANI:

20 Q. Okay. Can you put up five I please; can you tell me about
21 this?

22 A. Sure. This is a photograph posted by Pete Musico on May 26th,
23 2020, and it includes a photograph of Governor Whitmer's
24 house, a photograph of Governor Whitmer, it's got her address
25 listed on google maps, with directions to her residence and

1 then it's got record details from a -- a presumably from a --
2 a tax id, and from a government website with details about
3 her residence.

4 Q. Is there also like a property listing as well?

5 A. Yeah, that's what I'm trying to describe there. The property
6 listing is on the bottom two slides.

7 Q. And what is the post advocating for?

8 A. It, well I'll read it. It says please share, I saw this post
9 a few days ago on Facebook where the Michigan governors going
10 to be this Saturday, updated that's on the post and pictures.
11 The post stated that they're having a graduation party at
12 their small blue cottage in Traverse City. This is protest
13 at Saturday at one o'clock; I'll update this post with the
14 address when I find the pics that was posted on another page.
15 Isn't that nice she opens up northern Michigan, how
16 convenient for them, nothing but lies.

17 Q. Thank you, you can take that down please.

18 THE COURT: Okay a --

19 MS. DODDAMANI: I'm going to shift over; oh, I'm
20 sorry, thank you.

21 THE COURT: Okay Lynn put us back on you tube the?

22 MS. DODDAMANI: Thank you.

23 BY MS. DODDAMANI:

24 Q. All right. I'm going to ask about exhibits labeled under the
25 series six and those you previously testified are Paul

1 Bellar's, is that correct?

2 A. That's correct.

3 Q. Okay. And I'm going to ask for six A, go ahead?

4 A. This is an image from January 15th, 2020, and it's a

5 advertisement for a shirt, which says I'm just here for the

6 violence.

7 Q. Thank you. Six B?

8 A. This is a meme, and it says meme watching the Alphabet Bois

9 take cover behind my countless junk cars in my backyard not

10 knowing they're full of tannerite.

11 Q. What is Alphabet Boys?

12 A. Alphabet Boys is the Boogaloo's movement reference to the

13 FBI, the CIA, the ATF, the DEA, all the acronyms from federal

14 government.

15 Q. What's tannerite?

16 A. Tannerite an explosive material.

17 Q. Thank you. Six C please?

18 A. This is another meme that says when you and the boys raid the

19 local National Guard Armory and destroy a police station

20 thinking it would start an uprising with other Boojahdeen's,

21 but instead there's a nationwide manhunt for y'all and the

22 boys are asking me what to do now. And then it's got the

23 caption you boys like Mexico.

24 Q. Six D please.

25 A. This is a meme with individuals wearing ATF hats; it says the

1 ATF surprised by the level of resistance during Boogaloo.
2 And then there's a guy wearing tactical gear up front and
3 says me fully content with the violence.

4 Q. Six E, please?

5 A. This is a -- a meme, which is looking through the lens of
6 night vision goggles and it says them, you can't just
7 overthrow the US Government, me that's where your wrong you
8 kiddo.

9 Q. Six F?

10 A. This is a meme, which says, has a guy a shaking hands, it
11 says my family's saying I'm so sweet, and then it's got
12 another guy saying me, knowing I'm on a watchlist and will be
13 labeled a domestic terrorist in the near future.

14 Q. Six G?

15 A. This is a screen capture of a video from YouTube, which says
16 how to inform an officer you are carrying a handgun and live.
17 It's got a guy shooting out the window of a vehicle.

18 Q. Six H, please?

19 A. This is an image from the movie Red Dawn and it's a meme,
20 which says no matter the cost stand.

21 Q. Six I, please?

22 A. This is a meme with a guy wearing tactical gear which says my
23 politics now, and then there's a -- a smaller woman or child
24 on the right which says my politics in 2016?

25 Q. Six J?

1 A. This is a -- a meme or propaganda meant to look like a --
2 what you'd see when you go vote and it says I am republican,
3 democrat and Boogaloo, which is checked.

4 Q. Six K please, what's this?

5 A. This is a picture or a meme of an oil filter, an adapter in a
6 threaded barrel, which is instructions that the Wolverine
7 Watchman provided elsewhere in the investigation of how to
8 manufacture a suppressor.

9 Q. What's a suppressor?

10 A. A suppressor or a silencer is -- it's called an NFA weapon so
11 it's illegal if you haven't registered it.

12 Q. And what does it do?

13 A. It suppresses the sound or the decibels from a gunshot.

14 Q. Thank you. Six L?

15 A. This is another meme, which says me explaining to my normie
16 friends and family how a civil war almost kicked off this
17 weekend.

18 Q. Six M?

19 A. This is another meme which says bout to be that Boojahideen
20 content hour bois.

21 Q. Six, N thank you, six N, what's this?

22 A. This is an image, which is made to look like it's from the
23 website Foreign Hub. Com and it's got Governor Gretchen
24 Whitmer, it's got the caption gross, slut, fucks whole state.

25 Q. Six O, what's that?

1 A. This is a photograph of Paul Bellar in his residence in
2 Milford with writing across the screen that says Boogaloo
3 with a question mark.

4 Q. Six P, what's that?

5 A. This is a photograph of Paul Bellar's right arm with the
6 don't tread on me snake broken up into different colonies and
7 it says join or die.

8 Q. Six Q?

9 A. This is a selfie from Paul Bellar of himself wearing a
10 Boogaloo shirt.

11 Q. Six R?

12 A. This is a photograph of Paul Bellar's rifle with his kit in
13 his bedroom in Milford, and its got a oil filter with an
14 adapter on the end of his barrel.

15 Q. The silencer that you talked about earlier?

16 A. It would be a silencer if it's drilled out at the bottom.

17 Q. Thank you. Six S?

18 A. This is a photograph from January of 2020 with Joe Morrison
19 and Paul Bellar in their full kits or their body armor with
20 their rifles in front of the Capital.

21 Q. Six T?

22 A. This is a photograph of Paul Bellar with his rifle in full
23 kit with a gas mask inside his residence in Milford.

24 Q. Six U?

25 A. This is a photograph of Paul Bellar inside the Michigan

1 Capital in full kit with his rifle on April 30th, 2020.

2 Q. And full kit again is what?

3 A. That's his a ballistic body armor, plate carrier, ammo and
4 weapon.

5 Q. Thank you. Six, oh I'm sorry so you said this was April 30th,
6 is that correct?

7 A. That's correct.

8 Q. Okay. Six V, can you read that?

9 A. Sure. This is a screen capture from the Wolverine Watchman's
10 Wire account, and Paul Bellar who the alias on Wire is
11 Doc1776.2 states that moment when all your friends start
12 noticing you weren't kidding, that you're down to kill
13 tyrants.

14 Q. Thank you.

15 A. And it's got a screen capture of Paul Bellar inside the
16 Capital that was sent to him by one of his friends.

17 Q. Okay. And I'm sorry I didn't hear; did you identify who the
18 screen handle belongs to?

19 A. Yes, so Doc1776.2 is Paul Bellar's alias on Wire.

20 Q. Okay, thank you. You can take it down. All right, I think
21 we've gotten through the big bulkiness of what we've
22 submitted. So I want to go back to the Wolverine Watchman as
23 a group, through your training, investigation, and things
24 that you knew about them. So were there five, five or more
25 members in the group at the time you started your

1 investigation?

2 A. There were.

3 Q. Did those numbers grow?

4 A. They did.

5 Q. Okay. Was it a registered non-profit in the State of

6 Michigan?

7 A. It was not.

8 Q. Okay. Was there a common name sign or symbol that associated

9 this group?

10 A. Yes, they all identified with the Wolverine Watchman name.

11 Q. Okay. And I'm going to show, I'm going to ask you to look at

12 number eight please? Can you tell me what that is? Oh, I'm

13 sorry I'm asking you to look in the binder.

14 A. Oh.

15 Q. The exhibit binder hasn't been admitted yet.

16 A. I'm sorry.

17 Q. I apologize agent.

18 A. Yes, number eight is a photograph, which says Wolverine

19 Watchman and it's the profile picture from March 19th when I

20 analyzed the Wolverine Watchman's Facebook page.

21 Q. Thank you.

22 MS. DODDAMANI: I'm going to move for its admission

23 judge?

24 THE COURT: Okay.

25 MR. KIRKPATRICK: No objection.

1 MR. JOHNSON: No objection, your Honor.

2 MS. DODDAMANI: Okay.

3 THE COURT: Admitted.

4 MS. DODDAMANI: And would you display it please,

5 thank you?

6 (At 10:30 a.m., PX 8 admitted)

7 BY MS. DODDAMANI:

8 Q. Is that the picture?

9 A. That is.

10 Q. Okay. And that was a banner page on Facebook, is that

11 correct?

12 A. That's correct.

13 Q. Thank you. Can you tell me about the leadership structure of

14 the organization at the beginning, and then how it changed in

15 June of 2020?

16 A. Sure. So originally, when Joe Morrison and Pete Musico and

17 Paul Bellar created the Wolverine Watchman there was a

18 default leadership structure, which included some other

19 members like Ty Garbin and Dan Harris. And then in June of

20 2020 Paul Bellar called for -- to clarify and have a more

21 formal leadership structure.

22 Q. Okay. And was that leadership structure ever typed out, sent

23 around by Paul Bellar?

24 A. Yes, it was.

25 Q. And do you remember when that was?

1 A. Yeah, that was June 9th, 2020 following a -- a leadership
2 meeting in which they all agreed on their new structure.

3 Q. Thank you. I'm going to ask you to look at in you binder
4 exhibit number nine please and tell me what that is?

5 A. This is the leadership structure that Paul Bellar typed out
6 and sent out to the group.

7 Q. Okay. I'm going to ask you to look at exhibit, there's a
8 couple exhibits, A through C, ten A through C and describe
9 what that is?

10 THE COURT: Ten A through C?

11 MS. DODDAMANIN: Yes judge.

12 THE WITNESS: So ten is a photograph of a notebook
13 found in Joe Morrison's bedroom on a search warrant that was
14 executed on October 8th, 2020, and ten B is a close up of the
15 left side of that notebook. And then ten C is a close-up of
16 the right side, the right page, excuse me, of that notebook.

17 BY MS. DODDAMANI:

18 Q. Okay. Are these fair and accurate to your knowledge?

19 A. They are.

20 Q. Okay.

21 MS. DODDAMANI: I'm going to move for their
22 admission judge?

23 THE COURT: Mr. Kirkpatrick?

24 MR. KIRKPATRICK: No objection, your Honor.

25 THE COURT: Mr. Somberg?

1 MR. SOMBERG: No objection, your Honor.

2 THE COURT: And Mr. Johnson?

3 MR. JOHNSON: No objection, your Honor.

4 THE COURT: Okay, nine and ten admitted.

5 MS. DODDAMANI: Thank you judge. Could you display

6 number nine please, thank you.

7 (At 10:32 a.m., PX 9 and PX 10 admitted)

8 BY MS. DODDAMANI:

9 Q. Tell me about this?

10 A. Sure. So this is a photograph of Microsoft word that Paul

11 Bellar put out on June 9th. It says leadership and then CO,

12 which stands for commanding officer Boog Daddy Bunyan, which

13 is an alias for Joe Morrison, XO-LT.

14 Q. Which means what?

15 A. I'm forgetting the acronym for this.

16 Q. Executive officer?

17 A. Executive officer, thank you.

18 Q. Thank you.

19 A. Executive officer or lieutenant is Dan.

20 Q. Who's Dan?

21 A. Who's a -- that's my confidential informant.

22 Q. Okay.

23 A. And then sergeant, SGT, is Gunny that's Ty Garbin.

24 Q. Go ahead?

25 A. And Sergeant is Beeker that Beeker is an alias for Dan Harris

1 and then sergeant is Doc, and the Doc is an alias for Paul
2 Bellar.

3 Q. Thank you. Can you show us number ten please? This was
4 something that -- that -- number nine, is something that Paul
5 Bellar sent around in Wire?

6 A. Correct.

7 Q. And was that, who was it sent to?

8 A. It was sent to Wolverine Watchman leadership.

9 Q. And who was in Wolverine Watchman leadership?

10 A. My source Dan, Ty Garbin, Paul Bellar, Joe Morrison and Dan
11 Harris were the original members of Wolverine Watchman
12 leadership and then later Brian Puffenburger was added.

13 Q. Okay.

14 A. To the leadership.

15 Q. Thank you. Number ten A please? This was the notebook that
16 you described that was found in Joe Morrison's residence, is
17 that correct?

18 A. That's correct.

19 Q. Okay. And then ten B please. I'm just going, we're going to
20 do the close-ups of ten B and ten C and you can describe what
21 they are please, go ahead?

22 A. Sure. So this is the close-up of the left side of the page,
23 it's got handwritten notes and the notes read Commanding
24 Officer Boog Daddy Bunyan, again which is Joe Morrison.
25 That's the executive officer ETADIK, which is an online alias

1 for my informant. Sergeants are listed as Beeker who's Dan
2 Harris; Gunny, which is Ty Garbin, Frank's which is Kaleb
3 Franks and Bpuff, which is Brian Puffenburger. The mission
4 is to, to protect and secure liberty for all Michiganders, to
5 restore the constitutional republic followed by the Latin
6 phrase Mors Semper Tyrandis.

7 Q. Thank you. Ten C?

8 MR. KIRKPATRICK: Your Honor, I missed the date on -
9 - I missed the date on when that was obtained?

10 THE COURT: Could you give us that?

11 BY MS. DODDAMANI:

12 Q. Agent?

13 A. Sure, yeah, so that was obtained on October 8th, 2020 during a
14 search warrant, which was executed at Joe Morrison's and Pete
15 Musico's residence in Munith Michigan.

16 MR. JOHNSON: Your Honor, I didn't want to interrupt
17 the agent's testimony. Defense had previously filed a
18 hearsay motion, and the Court has it under advisement. We'd
19 just like to notice to the Court that at this point June 8th
20 and 9th for sure. But here's the point we'd be arguing it,
21 other things said by the members will be hearsay excludable
22 to Pete Musico, your Honor.

23 THE COURT: Okay, response?

24 MR. DODDAMANI: The -- are we arguing the conspiracy
25 motion at this point judge and when the conspiracy started

1 and when co-conspirators statements can be admitted because
2 I'm ready to argue that at this point if the Court would
3 like?

4 THE COURT: Okay.

5 MR. JOHNSON: I would argue, whose (inaudible) is
6 she putting --

7 THE COURT: Okay.

8 MS. DODDAMANI: Yeah, and it's our position judge
9 that we have just spent about an hour showing you that there
10 is a conspiracy.

11 THE COURT: I --

12 MS. DODDAMANI: For political motivated violence at
13 this point and since the founding of the group that that was
14 in fact it and as such every co-conspirators statement can
15 come in against the others.

16 THE COURT: Right, I -- I --

17 MS. DODDAMANI: Based on 801.

18 THE COURT: There are certain criteria that the
19 prosecutor does need to establish before statements of
20 alleged co-conspirators can come in. I appreciate Mr.
21 Johnson re-iterating that motion, but I would prefer to
22 handle it at the conclusion.

23 MS. DODDAMANI: Thank you judge.

24 THE COURT: Okay, thank you.

25 MR. JOHNSON: Thank you.

1 BY MS. DODDAMANI:

2 Q. Okay. So we were on, we finished this page, could you put up
3 ten C please, thank you Agent Chambers. What's this?

4 A. These are handwritten signatures on the right side of the
5 notebook which write out variations of the Boog Daddy Bunyan
6 multiple times and then the initials for it.

7 Q. Thank you. So we talked about the leaders that structure at
8 the beginning and then how it changed. Can you tell me
9 whether there was assigned membership criteria?

10 A. There was.

11 Q. Tell me about that, we had exhibit number seven before, is
12 that correct?

13 A. Yes.

14 Q. And exhibit number seven was the group description?

15 A. That's correct.

16 Q. And with that, it contained in it a defined membership
17 criteria?

18 A. Yes, it was and that was the initial description of the group
19 once you became a member of the group on Facebook. A more
20 specific description and ideology was required including an
21 interview and vetting by the defendants here today in order
22 to get into the group.

23 Q. So what do you mean by that, there was a -- it -- like a
24 criteria that you had to have?

25 A. Absolutely. So there was a vetting process in which you had

1 to provide your ideology, list your background, list your
2 weapons, list what you could bring to the fight. And then
3 those, if you passed a -- the membership criteria you'd be
4 invited into the group.

5 Q. Who would be participating in this vetting process?

6 A. Generally speaking the group leadership, but more
7 specifically um Joe Morrison and Paul Bellar did a lot of the
8 vetting online and Pete Musico would meet with the guys in
9 person at training. He wasn't part of the online vetting.

10 Q. Okay. And then if they passed the interview or the vetting
11 questions what would happen?

12 A. You'd be invited to show up and train in person with the
13 group.

14 Q. Were they ever asked about labels in the vetting questions?

15 A. Yeah, so one of the vetting questions was are you willing to
16 be considered a domestic terrorist.

17 Q. And if someone said yes would they be let into the group?

18 A. Yes, generally speaking.

19 Q. Someone -- were people not let in the group after this
20 vetting process ever?

21 A. Yes. So there is a number of individuals who didn't pass the
22 vetting. They either weren't trusted, or the group leaders
23 were able to find something that they didn't like about them
24 during vetting.

25 Q. All right. And so there was based on your investigation

1 defined membership criteria, is that correct?

2 A. Absolutely.

3 Q. Okay. So let's get into this next section topic here about
4 how the Wolverine Watchman came to your attention and some
5 information about the confidential informant. So pursuant to
6 court order here and stipulation of the parties we will be
7 referring to your confidential informant only by his first
8 name Dan, is that correct, that's your understanding?

9 A. That's correct.

10 Q. Thank you. So how was your attention drawn to Wolverine
11 Watchman, so how and when did it come on your radar?

12 A. So in mid-March of 2020 we received a -- a complaint or
13 information from a local police department in, around our
14 territory in Flint who had an individual who wanted to
15 provide information about violence to law enforcement.

16 Q. Is that person Dan?

17 A. That was.

18 Q. Okay. And were you put in touch with him?

19 A. I was, I arranged a meeting with Dan and interviewed him.

20 Q. Okay. And did you know him before this meeting that you
21 arranged for him to pass off information to you?

22 A. No, that was the first time I'd ever met him.

23 Q. Okay. And you said that he wanted to pass off information,
24 what did he want to pass off?

25 A. He just wanted to notify us about the Wolverine Watchman and

1 tell us that the group was a danger to law enforcement so
2 that we could go forth and investigate it as we saw fit.

3 Q. What was your understanding of his -- his membership in the
4 group?

5 A. He had been a member who had been vetted in and invited into
6 the Wire chats.

7 Q. Okay. And what was concerning about the information that he
8 passed off to you?

9 A. Well what was concerning was not only did they have a
10 perceived grievance and hatred towards law enforcement, but
11 they were taking overt steps or at least they were saying
12 they were taking overt steps to locate law enforcement
13 officers' addresses in order to target them and kill them
14 later.

15 Q. Okay. And did you, did he bring any proof of this to you
16 when you met or was it just him telling you these things?

17 A. No, he did, he handed us his cell phone and allowed us to go
18 through his cell phone to view all the -- the chats and the
19 contents that he was aware of?

20 Q. So did he just want to pass off this information to you and
21 go away, what was his intent that you understood in coming to
22 you?

23 A. Yes, that was his intent was to provide the information and
24 remove himself from the group and -- and -- and allow us to
25 investigate as we see -- saw fit. He wasn't intending to

1 stay with the group.

2 Q. Okay. And did you make an ask of him?

3 A. I did, I asked him to stay with the group and to help us

4 protect other citizens in Michigan who'd be in danger.

5 Q. Why'd you do that?

6 A. Well I recognized their redderick and I recognized the threat

7 they posed, and I recognized the propensity for violence they

8 had and the FBI didn't have an ability to step in right away

9 without, to stop it.

10 Q. How come?

11 A. Well we didn't have an investigation at the time, the group

12 was not on our radar and we didn't have, these groups are

13 notoriously tight knit and difficult to investigate.

14 Q. And so tell me about what -- what is an informant?

15 A. When informant in the FBI we call them a CHS, which is a

16 confidential human source, and an informant is somebody who

17 works on behalf of the case agent or the handling agent. So

18 on this case I was the handling agent with my partner Jason

19 Chambers for Dan.

20 Q. Okay. And so when you signed him up you were saying he

21 wasn't, was he looking to be a confidential informant when he

22 initially asked to meet with you?

23 A. He was not; he was just a citizen providing information who

24 was initially reluctant to be an informant.

25 Q. Okay. And I imagine that being an informant for the FBI has

1 a whole process involved in that, is that correct?

2 A. Yes, there's a lot of oversight, it's a fairly involved
3 process.

4 Q. Okay. Did you verify his background?

5 A. I did.

6 Q. Did you verify what his jobs were, whether he was employed?

7 A. I did.

8 Q. So tell me about that?

9 A. Well I learned that he was a military veteran who had served
10 numerous tours overseas and that he was employed with the
11 U.S. Postal Service.

12 Q. And did you look up his criminal history if he had any?

13 A. I did.

14 Q. And did he?

15 A. He had no criminal history.

16 Q. So this, was this a typical in your opinion confidential
17 informant that you would have?

18 A. Definitely not. A lot of times the motivations for
19 confidential informants to come forward are -- are different.
20 A lot of times, they have greed or they're trying to work off
21 a charge. So in this case when I recruited Dan it was purely
22 patriotism and not wanting to get people hurt in the United
23 States. Kind of an extension of the oath he took when he was
24 in the military.

25 Q. Okay. And did he request any payment for these services?

1 A. He did not.

2 Q. But you did in fact provide him payment later, is that
3 correct?

4 A. I did.

5 Q. Okay. And I'll -- we'll get to that in a second, but when
6 you say that you sign someone up to be a CHS, confidential
7 human source what do you have to do as an FBI agent? What do
8 you have to tell them about what they're going to engage in
9 at this point?

10 A. Well I have to give them what we call admonishments, which
11 are legal admonishments we're required to do. I have to tell
12 them that they're required to be truthful, they can't pass
13 themselves off as an FBI agent, they can't commit illegal
14 activity. I have to tell them, if they're paid, they got to
15 pay their taxes, I have to tell them that I expect them to be
16 truthful to me. I basically tell them this is a relationship
17 with me and they're representing me and that if there's any
18 illegal activity they need to let me know and they're not
19 authorized to do anything illegal on my behalf.

20 Q. So you talked about admonishments, but what about
21 instructions on what he was supposed to do in this group and
22 how he was supposed to report that back to you?

23 A. Sure. So in this case my instructions to our CHS were to be
24 a listening post, basically to advise and report. We made
25 the decision fairly early on in the investigation to record

1 everything and document everything so that anything he said
2 or is the integrity of the investigation through the
3 undercover and through the informant couldn't be questioned
4 later.

5 Q. Okay. So let's talk about payment, you did in fact make some
6 payments to the CHS, to Dan, correct?

7 A. I did.

8 Q. Okay. But he never asked you for payments you said?

9 A. That's correct.

10 Q. So why did you pay him?

11 A. Well we were asking a lot for him; he incurred a lot of his
12 personal expenses. He travelled across the county for
13 trainings and then he took off at least three weeks of work
14 without pay to do work on our behalf. So the amount of hours
15 he was putting in, especially to communicate with the group
16 at all hours of the night it was a substantial ask, and I
17 didn't feel like it was fair without compensating him.

18 Q. Is this normal process for the FBI?

19 A. Well I typically do pay informants, it -- it's common. I
20 mean sometimes I don't, we have to be careful when you pay an
21 informant as to what it does for their motivations. But it
22 is common as a handler to pay informants.

23 Q. Okay. And there must be a -- a very strict accounting
24 process for what is being paid out, is that correct?

25 A. That's correct, we've got a formal process where we have to

1 submit for every payment, provide receipts if it's
2 reimbursement and then provide justification.

3 Q. Okay. So how, what is the time period for which you paid
4 Dan's services for what he was doing? What -- how many
5 months we talking here?

6 A. Well generally speaking from March 17th, 2020 is when he
7 officially became on the books as an informant through the
8 take down of the Wolverine Watchman, which was October 7th in,
9 you know past midnight into the night of October 8th, 2020.
10 So approximately seven months' worth of work.

11 Q. Okay. So for those seven months of work can you tell me the
12 amount that was paid out to Dan and divide it into services
13 and reimbursement for expenses if you could?

14 A. Sure. There was about six thousand dollars for reimbursement
15 for expenses and then approximately twenty-four thousand
16 dollars for his services.

17 Q. Okay. And so you, that -- that -- those amounts were
18 provided to the prosecution is -- is that correct as the
19 exact breakdown, is that right?

20 A. Yeah, I provided a detailed breakdown of all the payments
21 made.

22 Q. Okay. And we're talking about expense, is it correct to say
23 six thousand seven hundred ninety-three dollars and ninety-
24 five cents?

25 A. That's correct.

1 Q. Okay. And that's reimbursement, is that right?

2 A. That's correct.

3 Q. But then there was twenty-four thousand for services for that
4 seven-month period, is that correct?

5 A. That's correct.

6 Q. Okay. Now after the take down you said which was the arrest
7 of several individuals on October 7, 2020 was any amount paid
8 to Dan?

9 A. Yes. We had a number of witness relocation and witness
10 protection expenses that occurred and that was about twenty-
11 four thousand dollars.

12 Q. Okay. And when you say relocation expenses for what major
13 items had to be paid out?

14 A. Well he had to get a new vehicle, and he had to sell his
15 house for a loss based on threats to his life.

16 Q. Thank you. Okay, I want to shift hears here a little bit,
17 and talk about your monitoring which you have testified
18 you've monitored the group throughout the course of this
19 investigation, is that correct?

20 A. That's correct.

21 Q. Okay. Now when you -- what are reports by a CHS, what does
22 that mean?

23 A. The reports are documents written by the handling agents, so
24 myself and Agent Chambers were the handling agents for Dan
25 would write reports, which are synopsis of what he --

1 summaries of what he's telling us and what's occurring. And
2 in this case, they're also verbatim statements made by the
3 defendants on Wire. So we actually copied what they were
4 saying on Wire and put them into reports.

5 Q. Okay. So I want to ask about the reports for a second. So
6 you would meet in person, is that a fair statement with Dan
7 after an event, is that correct?

8 A. That's correct, we'd perform a debriefing.

9 Q. Okay. And in that debriefing, he kind of spill out to you
10 all the information that he observed?

11 A. Yes, he would basically report what happened, the facts, who
12 was there at the training, what type of training occurred.
13 All of his observations.

14 Q. Okay. Now was he -- was -- did you ever talk to him about
15 hey you should remember this, because down the road you'll
16 have to testify or anything like that at, at these
17 debriefings?

18 A. We'd advise him on where things could be going, but generally
19 speaking, we just asked him to tell us what he saw. We
20 didn't want him to be involved in a where it was going, it
21 was just an observe and report type of thing.

22 Q. Okay. Now you said you monitored chats and communications.
23 You specifically talked about Facebook and Wire; how did you
24 monitor those?

25 A. Well Dan provided us consent to access his Facebook account

1 and his Wire account so then myself and my partner were
2 logged in and we were monitoring those communications live as
3 they were coming in.

4 Q. Okay. Under Dan's account?

5 A. That's correct, under Dan's username and handle.

6 Q. Now as this going on multiple devices, did he have his own
7 device, did you have a device, like how did this work? Could
8 you log in on multiple devices?

9 A. Yes. So Agent Chambers had a device logged in, I had a
10 device logged in and Dan had a device logged in, so we were
11 all monitoring the communications live as they were
12 occurring.

13 Q. Okay. And would you screen capture those communications?

14 A. Yes, we would.

15 Q. How come, why can't you just like you know search warrant it
16 or something?

17 A. Well we did, we can search warrant Facebook and we did, but
18 for Wire it's a not a U.S. company so they're not -- they
19 won't respond to legal process and even if they would Wire is
20 an encrypted app and has end-to-end encryption, so it doesn't
21 maintain information on their servers and so that's one of
22 the reasons why it was used as a secure communication
23 platform by the Wolverine Watchman.

24 Q. Okay. So you said you were monitoring these communications
25 live, did you ever because you had access to Dan's account,

1 did you ever comment yourself as if you were Dan?

2 A. Absolutely not.

3 Q. Why not?

4 A. Well that would be an undercover operation, which we did have

5 an undercover operation later in the game. But primarily for

6 Dan's safety, Dan was meeting with these guys regularly and

7 communicating with them. They knew him well and I didn't

8 want to risk that or risk the operation by saying something

9 that wasn't Dan's persona.

10 Q. Okay. And by monitoring these communications, you gained

11 familiarity with the screen names and handles of the

12 individuals in the courtroom today?

13 A. That's correct.

14 Q. So can you tell us each individual what their handle was?

15 A. Sure.

16 Q. If you haven't already?

17 A. So Pete Musico's handle was Grandpa.

18 Q. Okay.

19 A. Joe Morrison's handle was Boog Daddy Bunyan or George and

20 then Paul Bellar's handle was Doc1776.2.

21 Q. And what was that a reference to?

22 A. 1776, Doc is a reference to his role as a medic on behalf of

23 the group and then 1776 is a reference to the American

24 Revolution and then point two is a reference to the second

25 American Revolution which he's calling for.

1 Q. And you talked about recordings and how you started recording
2 fairly early, tell me about that? When did you start and
3 why?

4 A. Sure. So we started recordings on April 30th, 2020, the day
5 that the Wolverine Watchman were able to gain access into the
6 Capital armed and we started.

7 Q. As part of, what was April 30th?

8 A. So April 30th was a protest outside the Capital when leg --
9 legislators were in session and they were expected to vote on
10 the state, congresses, the governors' powers I believe. It -
11 - it was a legal process for the COVID restrictions or the
12 lockdown that was in place at the time.

13 Q. Okay. And so there was -- there was a rally at the Capital
14 that you're talking about?

15 A. Yeah, so that's the, on April 30th, that's the day we started
16 recording and we started recording because of what was
17 reported on April 15th, which was another rally at the Capital.
18 That was Operation gridlock at the Capital in which the
19 Wolverine Watchman attended and protested.

20 Q. Okay. We will get to that. You had different recording
21 devices, is that correct?

22 A. That's correct.

23 Q. Would you pass them to your source?

24 A. Yes, so prior to an operation or a planned event by the
25 Wolverine Watchman I -- we'd meet with our source, provide

1 instruction and then provide Dan the recording devices.

2 Q. Would you get those back from Dan after the event?

3 A. Initially we would and then as the case went on the

4 defendants would call Dan throughout the week and continually

5 contact him. And we didn't want to miss any recordings so

6 then we actually provided additional recording devices, which

7 we would trade out so that he always had one on hand to

8 document their communication.

9 Q. Okay. Did you ever tell him to selectively record or

10 anything? What was your instruction to him about recording?

11 A. Our instructions were to record absolutely everything and

12 anytime he has communication make sure it's documented, and

13 if he missed or if a problem happened if he ran out of

14 batteries to let me know so we could document it.

15 Q. Okay. What about were some of the events that Wolverine

16 Watchman attended live monitored?

17 A. Yes, so every time Dan engaged in training or met with them

18 in person as a handling agent for his security, I live

19 monitored the events.

20 Q. Okay. All right. I want to talk about how this group was

21 created, the Wolverine Watchman. In your investigation, did

22 you determine when and how the group was created?

23 A. Well I determined when Joe Morrison initially created the

24 group on Facebook.

25 Q. Tell me about that?

1 A. So on November 25th, 2019 Joe created a group Facebook page
2 for the Wolverine Watchman, which I previously described the
3 profile picture and the mission statement.

4 Q. And did that timing coincide with anything in Joe Morrison's
5 life?

6 A. Well it occurred shortly after a local criminal charge; a gun
7 charge was adjudicated in State Court on November 21st, 2019
8 in Macomb County.

9 Q. So we're talking about how it's four days later the creation
10 of this group, is that correct?

11 A. That's correct.

12 Q. Okay. And what happened in that case? I'm sorry, strike
13 that. Was that case resolved?

14 A. The case was resolved.

15 Q. And how was it resolved?

16 A. Joe was sentenced to time served, a day in jail.

17 Q. And was it a felony or a misdemeanor?

18 A. It was pled down to a misdemeanor.

19 Q. Okay. Now at the formation of this group you of course
20 received Facebook returns as you talked about. Was there --
21 was the group and Joe Morrison discussing Boogaloo at that
22 time?

23 A. Yes, so from the creation of the group in November through
24 December, January, February, the group was talking about the
25 Boogaloo.

1 Q. Okay. And based on your monitoring and your observations was
2 there an agreement among the individuals in -- in the
3 courtroom for politically motivated violence in that group?

4 A. Yes, that was the whole concept of the group.

5 Q. Okay. And what leads you to know that?

6 THE COURT: Let me; let me interrupt you just for a
7 second. I promised everyone a break, the -- the first break
8 really wasn't a break but on the other hand I -- I -- I'd be
9 more than happy to a break for ten or fifteen minutes and
10 then continue on to noon.

11 MR, KIRKPATRICK: I would agree with that, your
12 Honor.

13 MS. DODDAMANI: That's fine, thank you, judge.

14 THE COURT: Okay. And I think, you know you might
15 want a break.

16 THE WITNESS: Right.

17 THE COURT: I mean I; I think Mr. Johnson may have
18 to.

19 MR. JOHNSON: Well Judge McBain is willing to wait
20 till twelve. I'll run down there to see --

21 THE COURT: Okay.

22 MR. JOHNSON: -- if I could see him, but I got two
23 matters, so that's why didn't start during the first break.

24 THE COURT: Okay.

25 MR. JOHNSON: Because he may not release me.

1 THE COURT: Okay. Okay. Let -- let's do it for
2 fifteen minutes and then we'll go approximately forty-five
3 minutes.

4 MS. DODDAMANI: Thank you, your Honor.

5 MR. JOHNSON: Thank you, your Honor.

6 MR. SOMBERG: Thank you, your Honor.

7 (At 10:58 a.m., recess)

8 (At 11:18 a.m., back on record)

9 THE COURT: Mr. Ballard has given me permission to
10 go ahead and start without Mr. Johnson.

11 MS. DODDAMANI: Okay.

12 MR. TOWNSENDS: Okay.

13 THE COURT: He -- he's -- he's willing to do that,
14 and I appreciate that because I think he might be down in a
15 different courtroom right now.

16 UNKNOWN MALE: That's how it goes sometimes.

17 THE COURT: Well everyone's busy, I understand that.
18 Tell me when we're back on then.

19 MS. CAVANAUGH: We're good.

20 THE COURT: Okay, we're back on the record, and the
21 prosecutors going to continue their direct examination of the
22 initial witness, go ahead.

23 MS. DODDAMANI; Thank you, your Honor.

24 CONTINUED DIRECT EXAMINATION

25 BY MS. DODDAMANI:

1 Q. Okay. So earlier Agent Impola you testified about being made
2 aware of threats to law enforcement, is that correct?

3 A. That's correct.

4 Q. All right. And tell me about who in the courtroom
5 specifically and what -- what was said?

6 A. Sure. So Pete Musico specifically had promoted to the group
7 to use the OnX Hunt app, which is an application you download
8 on your phone and he said that the group should be looking
9 for law enforcement officers in their area so that you could
10 -- you could target them or the group could target them for
11 their own search warrants, which they called no knock rays
12 which would be guns in retaliation for some of the other
13 victims that they believe had been targeted by law
14 enforcement.

15 Q. Okay. Were you talking about like some of the names on the -
16 - the flag that we saw in one exhibit?

17 A. Yeah, like Duncan Lemp was one of the prime guys that they
18 would talk about.

19 Q. Okay. And so who did he communicate the sorts of ideas to?

20 A. So he brought it up to the group every time in training or
21 frequently in training, I shouldn't say every time, in March.

22 Q. In March of 2020?

23 A. That's correct.

24 Q. So right when your investigation began, is that correct?

25 A. That's correct.

1 Q. All right. And did he ever say anything about having
2 committed past violence against law enforcement?

3 A. Yes.

4 Q. Tell me about that?

5 A. So he, he told members of the group that in the past he'd
6 been pulled over for speeding by Michigan State Police and
7 that he had obtained the officers name and then found out
8 where he lives and then he had done surveillance on the
9 officers' house and thrown a Molotov cocktail into the house
10 and then stood out behind the house with his rifle to shoot
11 the officer. And he stated he decided not to shoot the
12 officer when he did that.

13 Q. Okay. So what did you do in response to some of these
14 threats that were being discussed among the group? Did you
15 have to do anything in response? Did it affect the conduct
16 of government let's say?

17 A. Well it definitely affected my job and my conduct. I did
18 quite a number of things besides opening investigations,
19 initiating domestic terrorism and I guess investigations
20 against individual members here today, and then the terrorism
21 enterprise investigation. I contacted Michigan State Police,
22 advised them of the threats, and then I contacted the MIOC,
23 and our Intel branch and we put out.

24 Q. What is the MIOC?

25 A. MIOC is the Michigan Intelligence Operations Center.

1 Q. What is that?

2 A. It is headquartered by Michigan State Police, and it is a --

3 kind of a unified command structure in Lansing to distribute

4 information to law enforcement.

5 Q. Okay. What else did you do if anything?

6 A. Well we put out an Intel bulletin with the FBI and with

7 Michigan State Police identifying Joe Morrison and Pete

8 Musico so that any law enforcement officer who happened to

9 encounter them or pull them over would be aware of their

10 propensity for violence and wouldn't be hurt.

11 Q. What's a -- what's a bulletin?

12 A. It's a notification or a bolo.

13 Q. What's a bolo?

14 A. It's be on the lookout and that's what bolo is short for and

15 a bulletin is kind of a one-page flier that gets distributed

16 to law enforcement.

17 Q. Okay. Were there any specific threats by Paul Bellar that

18 caught your attention that made you have to affect

19 government?

20 A. Yes definitely. So Paul talked about throwing Molotov

21 cocktails into the governor's house.

22 Q. And roughly, what date was that?

23 A. That was mid to end of April 2020.

24 Q. Okay. Hang on one second. Were there other communications

25 that concerned you with Mr. Bellar?

1 A. Yes. So Mr. Bellar made a number of communications about how
2 he was going to go fighting and about the Boogaloo.

3 Q. Okay. I'm going to ask you to take a look in your binder at
4 eleven A, B, and C please. And can you also look at number
5 twelve?

6 A. Sure I have those here.

7 Q. And do you have a date on that?

8 A. I'm sorry on twelve?

9 Q. I'm sorry on eleven A through C?

10 A. That's April 22nd, 2020.

11 Q. Okay. And what is eleven A through C?

12 A. So eleven A through C, are screen captures of encrypted Wire
13 chats from the Wolverine Watchman's main Wire chat.

14 Q. When you say main Wire chat tell us what that is?

15 A. Well they had a number of different chats or text groups.
16 They had an armory chat, a meme chat, a leadership chat,
17 medical chat, a protest chat. So each chat had specific
18 individuals for that function of -- of whatever the chat was.
19 But for the main chat, every member of the Wolverine Watchman
20 was a member of the main chat after they were vetted in.

21 Q. Okay. And so the screen shot you're looking at, eleven A
22 through C recognize that, is that fair and accurate?

23 A. It is.

24 Q. Okay. And then how about twelve, tell me what twelve is?

25 A. So twelve is another screen capture of an encrypted Wire chat

1 from April 30th, 2020.

2 Q. Okay. And what is -- what is it generally?

3 A. Generally speaking it's got a link to Governor, news article
4 for Governor Whitmer's extended -- extension of the lockdown
5 orders.

6 Q. And some conversation between whom?

7 A. Some conversations between Joe Morrison and Paul Bellar.

8 Q. Okay. And -- and is that fair and accurate as well?

9 A. It is.

10 MS. DODDAMANI: I'm going to move for the admission
11 of eleven A through C and twelve judge.

12 MR. KIRKPATRICK: No objection.

13 MR. SOMBERG: No objection.

14 MR. BALLARD: No objection.

15 THE COURT: Okay. Eleven and twelve are admitted.
16 (At 11:25 a.m., PX 11 and PX 12 admitted)

17 MS. DODDAMANI: You can put up eleven A please.

18 THE COURT: Eleven A through C.

19 BY MS. DODDAMANI:

20 Q. Okay. Tell me what this is?

21 A. So this is a Wire chat with Doc1776.2 as Paul Bellar and Ty,
22 which is Ty Garbin.

23 Q. And Ty Garbin is who?

24 A. Ty Garbin is a federal defendant whose been charged with his
25 plots to kidnap the governor.

1 Q. Okay.

2 A. He's a member -- he's a leader in the Wolverine Watchman.

3 Q. Okay. And was he a member of the Wolverine Watchman during

4 the course of the investigation?

5 A. Yes, he was one of the founding members since March.

6 Q. Okay.

7 A. When we got involved with the investigation.

8 Q. Okay. So read me the relevant portions of this?

9 A. Paul Bellar stated a legislator just stopped at my girl's

10 restaurant and told her that Gretchen is extending that, the

11 order until the end of May. Ty Garbin stated I read

12 something earlier about he doing a temporary short extension.

13 Paul Bellar stated I swear to God if this is true, I'm going

14 to Molotov her fucking house, I'm so fucking done with her.

15 Q. Go to eleven B please, which is my understanding it would be

16 like the rest of this chat. It would, because it's a

17 scrolling chat, is that correct? Like it goes from top to

18 bottom?

19 A. That's correct, it's a continuous on your phone as you scroll

20 and we're taking snapshots or screen captures of pertinent

21 portions of it.

22 Q. Okay. So eleven B is a continuation of that conversation?

23 A. That's correct.

24 Q. And go ahead.

25 A. So Ty Garbin posted a photograph of himself wearing night

1 vision goggles, it's a selfie with his ballistic armor on, it
2 said say when. Paul Bellar stated I'm serious, I'm honestly
3 about to snap. I can't afford to miss one month's rent let
4 alone a whole nother fucking month. She's about to make me
5 go homeless.

6 Q. I'm going to continue it with eleven C, is this a
7 continuation?

8 A. It is.

9 Q. Go ahead?

10 A. Paul Bellar continues and says I guess my girlfriend got blue
11 pilled, she's over here defending Gretchen, I'm about to
12 snap. Ty Garbin stated got the blue pill, seriously.
13 Grandpa, which is Pete Musico, stated at Boog Boy 1776 are
14 you going to protest tomorrow? Paul Bellar stated I'm going
15 the 30th.

16 Q. Okay. Can you put up number twelve please? What's this
17 Agent Impola?

18 A. This is a chat later on April 30th.

19 Q. And tell me about the relevant portions of this?

20 A. Sure. So Paul Bellar posted a link to a news article about
21 the extension of the state of emergency and said guys she
22 still extended it this time to the twenty-eighth. Joe
23 Morrison stated and she's getting sued, Doc, Paul Bellar
24 stated she needs to get dragged to the streets and hung. I
25 knew this shit was going to happen.

1 Q. Okay. Thank you. Did Paul Bellar ever comment about whether
2 protest were affective or useless in a March, I'm sorry April
3 12th, 2020 on Wire?

4 A. Yeah, so Paul Bellar stated that protest weren't going to get
5 it done, they needed to step it up.

6 Q. Okay. And were there, let me -- let me ask about Pete
7 Musico's specific statements that were a cause of concern
8 here regarding law enforcement or terroristic type threats.
9 Tell me about those?

10 A. Sure. Well Pete Musico frequently made fatalistic statements
11 about how he's in his forties, he's lived a good life and
12 he's ready to start off the Boog. He stated a --

13 Q. And the Boog being a reference again to?

14 A. The Boogaloo.

15 Q. Okay.

16 A. So the civil war. He stated he's willing to commit Jihad to
17 the group in preparation for one of their protest, and he
18 stated the he was probing Michigan State Police's defenses
19 and -- when they were protesting at the Capital and that, he
20 was trying to get officers to touch him so they could kick
21 off the Boog.

22 Q. Okay. What about Joe Morrison, what can you tell me about
23 him?

24 A. Well Joe -- Joe led everything on the Wire chats and as the
25 leader of the group Joe gave direction to the group about how

1 he wanted, regional QRF's or quick response forces set up and
2 Joe frequently talked about operational security. He'd
3 admonish Pete Musico about his operational security, and he'd
4 maintain all the group chats with the direction that he
5 wanted for each particular group such as the vetting chat,
6 the protest chat, that type of thing.

7 Q. And so can you tell me about his rule online here, in the
8 organization of this group and whether he would reach out to
9 other groups or can you tell me about that kind of thing?

10 A. Sure. So Joe Morrison or George Bunyan as he was known in
11 the Boogaloo community was the face of the Wolverine
12 Watchman. So he was the national contact and he maintained
13 national contacts across the United States with other Boog
14 bois or other militias or others that he was recruiting or
15 were sympathetic to. So he had a heavy online presence and
16 then he was the primary person to put them in contact with
17 other militia and arrange trainings and use his national
18 contacts on behalf of the Wolverine Watchman.

19 Q. Okay. And we'll get into a little bit more detail on that in
20 a moment. But was there animosity in the group towards
21 Governor Whitmer and when did that start?

22 A. So there was --

23 Q. And specifically by these three individuals in the courtroom
24 today?

25 A. Yes definitely. There was animosity from the Wolverine

1 Watchman from the inception of their Facebook page, so in
2 November, December and January prior to the COVID shutdowns
3 and when COVID became a -- came onto the picture in the
4 United States. They were constantly sending memes about
5 Governor Whitmer and they were afraid of her red flag laws.
6 They were commenting about the tyranny of the state well
7 before COVID.

8 Q. Did it change once COVID restrictions started being put in
9 place in March and April of 2020?

10 A. Well their recruiting picked up and they were able to use
11 COVID and the restrictions for propaganda for their group.
12 They were able to capitalize on the politics in order to
13 spread the message about combatting tyranny and get more
14 followers.

15 Q. Okay. Now what -- based on your observations and monitoring
16 the investigation did you ever have to contact the governor's
17 security detail for any reason?

18 A. Yes. Shortly after the investigation started, I made contact
19 with the commander of the governors' security detail and
20 advised them of the mission of the Wolverine Watchman, the
21 hatred for Governor Whitmer as well law enforcement and
22 other, others defending the Capital.

23 Q. Okay. I'd like to shift focus now and talk about, instead of
24 online communications I'd like to talk about things that
25 occurred in real life. So in real life activities. What can

1 you tell me about trainings that were occurring in Munith
2 Michigan, in the County of Jackson?

3 A. Well by the time we, we meaning the investigative team became
4 aware of the Wolverine Watchman the leaders stated there had
5 already been seven in person tactical trainings and then
6 during the course of our investigation there were an
7 additional seven trainings or security meetings in Munith.

8 Q. What is -- what is -- what is a training, what is a field
9 training exercise? Tell me what that is?

10 A. Well the acronym is FTX, so field-training exercise is what
11 is used in the military and in the Wolverine Watchman. And
12 generally speaking, you're going in full kit; you're using
13 your rifle and you handgun. You're cycling through your
14 primary and secondary weapon systems and you're practicing
15 paramilitary trainings. So you're practicing things like
16 leaping and bounding, cover verse concealment, shooting while
17 moving. In this case, they practiced a lot of offensive
18 techniques such as breeching doors, clearing houses that
19 weren't their own houses, communicating as a team after
20 contact with law enforcement. And then Paul Bellar, his
21 specialty was tactical medicine so upon receiving wounds
22 during attacks -- during attacks or during a firefight how to
23 a plugholes and keep going, keep your team in the fight.

24 Q. Okay. So tell me about the Munith property, who lives at the
25 Munith property?

1 A. So Joe Morrison owns the Munith property and lives there with
2 his wife and child and Pete Musico also lives there with his
3 wife.

4 Q. Are the two related?

5 A. Yes, so Pete Musico is a father-in-law, so his daughter is
6 Jayda Morrison who is Joe Morrison's wife.

7 Q. Okay. And describe the property for us?

8 A. Sure. It's a rural two-to-three-acre lot with a stream
9 running behind it. It's got heavily wooded behind and they
10 generally had a trailer at the front of the property where
11 some other family and relatives would stay. They did some --
12 some farming, had vehicles parked throughout the lot and then
13 the tactical training would often occur at the rear of the
14 property, kind of firing into the woods. There's some open
15 fields on -- on the sides of the property.

16 Q. Was the property modified or had any features that would
17 allow it, that was set up for training like this?

18 A. Well they set up kind of a makeshift shooting range and then
19 Pete Musico had fortified the property with a number of
20 preparations in case law enforcement came.

21 Q. Like what?

22 A. Well as he described it, he had propane canisters set up
23 throughout the property so that he could shoot them and act
24 as IED's if law enforcement approached. He also had mantraps
25 and shotgun shells on mousetraps set up throughout the

1 property. He described having fishing line set up in the
2 woods with shotgun shells attached to it and then he
3 described having buried caches of weapons throughout the
4 property.

5 Q. What's a berm?

6 A. A berm is a built-up debris or, anything to be a backstop for
7 a bullet.

8 Q. Was there a berm on the property?

9 A. There was a -- a makeshift berm.

10 Q. Okay. Were there any targets set up on the property for this
11 training?

12 A. Yeah, they'd set up makeshift targets, paper targets. A lot
13 of times if they weren't ready, they would just practice dry
14 fire exercise.

15 Q. What's dry fire or exercise?

16 A. Dry fire is shooting his, going through the movements of
17 moving with a weapon without actually using the ammunition.

18 Q. So like holding a firearm?

19 A. That's correct.

20 Q. Okay. And you said that -- earlier that -- that Mr. Bellar
21 provided some sort of medical training, what can you tell me
22 about that at these trainings?

23 A. Well Mr. Bellar described himself as an EMT and then as a
24 tactical medic for the group. He advised the group, not only
25 the Wolverine Watchman, but later members who were involved

1 in the plot to kidnap the governor he helped train them on a
2 -- their tactical first aid kits, what they should carry, how
3 they should plug holes and respond and stay in the fight. So
4 he'd provide this expertise, he'd write an itinerary as -- he
5 was one of the training officers and he would include his --
6 Q. Training what?
7 A. Tactical training officers.
8 Q. Okay.
9 A. So any FTX movement Paul Bellar would organize it.
10 Q. Okay. And would these trainings be hosted, who would these
11 trainings be hosted by, this was you said Joe Morrison's
12 property. How would he organize and host it?
13 A. Well Joe Morrison and Pete Musico would host and invite the
14 rest of the group. They were generally speaking bi-weekly.
15 MR. JOHNSON: Well then, I would your Honor I -- I
16 would object, that answers compound. Are they both hosting
17 and inviting, is one, I -- I don't understand that answer?
18 MS. DODDAMANI: Well they -- if there's an objection
19 to a compound question it's one thing, but I think maybe he
20 could, maybe I could just clarify.
21 THE COURT: Why don't you clarify?
22 MS. DODDAMANI: Yeah.
23 THE COURT: I -- I think he added on, over and above
24 what the question asked so.
25 MS. DODDAMANI: Okay.

1 THE COURT: So they jointly host, end of story, go
2 ahead.

3 BY MS. DODDAMANI:

4 Q. Yes. Who would host the trainings, let me ask you that?

5 A. Joe Morrison hosted the trainings.

6 Q. Okay. And would Pete Musico be involved in the training?

7 A. Yes, Pete Musico lived there and was involved as well.

8 Q. How was he involved, what does that mean?

9 A. He participated in the trainings; he addressed the Wolverine
10 Watchman as a leader prior to the trainings.

11 Q. Okay. Were there any other role at these trainings that Pete
12 Musico would take on?

13 A. Well --

14 Q. Even ones that was self-described?

15 A. Well Pete --

16 Q. Did he provide any guidance?

17 A. Yeah, so Pete Musico would provide guidance on the direction
18 of the group, he would provide guidance on how the Wolverine
19 Watchman were going to operate and what his thoughts were on
20 the tactics.

21 Q. Okay. What about these trainings, would they have an element
22 of food or socialization involved in them?

23 A. Yes. Often times after the training or depending on the time
24 of the training they would -- they would eat or barbecue or
25 socialize as families. At the beginning of the training, or

1 excuse me, at the beginning of the investigation they were
2 more social and then as they became more serious about
3 attacks, they stopped inviting families and girlfriends.

4 Q. Okay. And who decides what would occur at training?

5 A. Well specifically Paul Bellar would write out the training
6 itinerary and schedule and then he would get input from the
7 leadership through and pass it off to Joe. Joe would provide
8 general direction as well as Pete on what the group should be
9 working on and then Paul would come up with the actual plan,
10 run it by them, then distribute it, and help run the
11 training. He would also use my CHS Dan to help with the
12 training as a range safety officer and to run tactics by him.

13 Q. Okay.

14 MR. KIRKPATRICK: Your Honor, at this point just for
15 the record I'd like a timeline of when this training, Mr.
16 Bellar was involved in because I believe the testimony
17 ultimately would be Mr. Bellar's out of the State of Michigan
18 on July 27th. So I'm just asking the questions could be tight
19 and that there was a lot of training here your Honor, some of
20 which my client was involved in, some of which my client was
21 not involved in. So I want the questions to be a little more
22 specific when he's talking about Mr. Bellar and the actual
23 training that he, that the one that he was actually present
24 at and not characterizing as all the trainings because that's
25 just simply not true.

1 MS. DODDAMAANI: I'm getting there judge, my -- my
2 plan right now is I'm trying to lay a foundation here about
3 his knowledge and what he knew and then, and how the
4 investigation progressed. I'm actually going to go through
5 each training that Mr. Bellar was at in that time period that
6 counsel asks for. So I will definitely try to, I'm going to
7 finish laying this foundation judge and I'm going, going to
8 move on a little bit.

9 THE COURT: I perceive it generally as foundation, I
10 -- I -- I understand your position and ultimately, I -- I
11 think it's significant as to who attended what trainings.
12 But to a significant degree, if she doesn't clarify that as
13 we go down the road you certainly can do it on cross-
14 examination.

15 MR. KIRKPATRICK: Understood.

16 THE COURT: But I -- I understand your concern.

17 MR. KIRKPATRICK: Thank you.

18 MR. DODDAMANI: Thank you, judge.

19 BY MS. DODDAMANI:

20 Q. So I'm going to ask you to look specifically in your binder
21 at exhibits thirteen and fourteen please.

22 A. I have them here.

23 Q. Can you tell me what thirteen is?

24 A. Sure. Thirteen is a photograph of handwritten notes on lined
25 paper, which are dated from April 19th of 2020.

1 Q. And what is it generally?

2 A. Generally speaking it is handwritten notes of training
3 itinerary and movements that would be conducted at training.

4 Q. Where was it, where was it found?

5 A. This was found in Paul Bellar's apartment on August 6th, 2020.

6 Q. Thank you. And can you describe for us what number fourteen
7 is?

8 A. Sure. This is a typed-out training schedule, which includes
9 a number of broad topics that the Wolverine Watchman
10 performed on June 14th, 2020.

11 Q. And who sent this around and what was the date?

12 A. So Paul Bellar distributed this to Wolverine Watchman
13 leadership on June 9th, 2020 in preparation for their
14 mandatory training on June 14th, 2020.

15 Q. Thank you.

16 MS. DODDAMANI: I'm going to move for their
17 admission judge.

18 THE COURT: Thirteen and fourteen, any objections,
19 any objection?

20 MR. KIRKPATRICK: No objection

21 MR. SOMBERG: No objection.

22 THE COURT: Any objection, Mr. Johnson?

23 MR. JOHNSON: Your Honor this would be subject to
24 motions we've already --

25 THE COURT: Correct, correct. Admitted, thirteen and

1 fourteen.

2 (At 11:44 a.m., PX 13 and PX 14 admitted)

3 MS. DODDAMANI: Thank you. Could you put up
4 thirteen?

5 BY MS. DODDAMANI:

6 Q. Tell me about this?

7 A. Sure. So these handwritten notes, I'll just go from the top.
8 They talk about basic funds, they talk about I'm up, he's
9 sees me I'm down a gear test. There's a low crawl gear test,
10 there's squad movement, diamond, arrowhead, peeling off
11 there's a description of a kill house and breeching. There's
12 a bullet with crossing a roadway or path. There's another
13 bullet here that says Bellar's obstacle course, one-to-two-
14 man course. There's a drawing of squad movement, which
15 includes dragging a body from one place to another under
16 fire. There's a classroom setting description and then the
17 lower half of the page talks about land nav, which is short
18 for land navigation. It says basic medical shit, NCO story
19 time and comments, questions, concerns.

20 Q. And what does this appear to be?

21 A. This appears to be Paul Bellar's itinerary for the April 19th
22 FTX, field training exercise in Munith.

23 Q. Thank you. Can you put number fourteen up please, tell me
24 about this?

25 A. This is a typed-out training schedule for their mandatory

1 training. It talks about basic fundamentals for new members.
2 It talks about vehicle training, vehicle maneuvers, driver
3 down situations, convoy tactics, storage, usage of the
4 vehicle, how to operate in a vehicle, using the A and B
5 pillars of a vehicle. Dismounting and moving around a
6 vehicle, responding to contacts, taking a possible hostile
7 vehicle over. The second section is ambush tactics such as
8 planned ambushes, opportunity ambushes, L shaped ambushes,
9 responding to an ambush flank followed by, I don't know jack
10 shit about ambushes, so this is -- so this is all Beaker and
11 Dan's shit, I'm out, laugh my ass off. The final portion is
12 medical such as CPR, M.A.R.C.H do not send up pictures of
13 rash, rashes in weird places for advice, we're not actually
14 docs. Scene security, when is the right time to scream for a
15 medic and giving self-aid.

16 Q. And this is labeled as a training schedule, is that correct?

17 A. That's correct.

18 Q. Was there actually a training that occurred in Munith on 6-

19 14-2020?

20 A. There was.

21 Q. Okay. And these tactics, are you familiar with all of this

22 language and these different types of tactics?

23 A. Yes.

24 Q. Are these offensive or defensive tactics?

25 A. Generally speaking they're offensive tactics.

1 Q. Which --

2 A. Leaving a vehicle and all the ambush tactics are offensive.

3 The medical could be generally defensive.

4 Q. Okay. What does it mean to breach?

5 A. Breach is to get through and opening, to enter a building.

6 Q. Thank you. What is a QRF Agent Impola?

7 A. QRF is a quick reaction force.

8 Q. So what's it supposed to do?

9 A. It's supposed to be staged and trained and have a

10 communication platform so that they can respond to contact

11 generally.

12 Q. Okay. So did the Wolverine Watchman have a QRF?

13 A. Yes. So Joe Morrison, Pete Musico and Paul Bellar instituted

14 regional QRF.

15 Q. What does that mean?

16 A. That means they created a specific QRF chat group and then

17 they invited and trained their most proficient operators who

18 are in the same region to be in that chat group so that they

19 could respond.

20 Q. So what does that mean respond?

21 A. Well it -- it means that they would come with their weapons

22 and they would engage law enforcement or whomever they're

23 called out to do in a firefight if necessary, to protect

24 their teammates.

25 Q. So was this idea of a QRF just a chat group, all talk?

1 A. No, it wasn't.

2 Q. Tell me about that?

3 A. Well Joe Morrison and Pete Musico provided instructions to

4 the group about how to get everybody's notif -- get

5 everybody's attention through a ping and then how to do a

6 location drop if you needed assistance and then --

7 Q. What is ping, and what is a location drop?

8 A. A ping is a feature of the encrypted Wire app and it provides

9 a different notification to get everybody's attention. The

10 concept there is that there's hundreds of posts per day and

11 they're sometimes hard to keep up with. So if you need --

12 you need everybody's attention you drop a ping and then if

13 you provided a location drop that means you're in trouble and

14 you needed members of your team to respond.

15 Q. So what is a location drop mean though?

16 A. Location drop is the GPS coordinates of where you're

17 currently at.

18 Q. Okay. And there's a way that you can, in Wire, give that

19 information to other members of the group?

20 A. Yes, there's a feature of Wire that takes your location and

21 maps it on google maps and you can, if you hit the location

22 button on Wire it distributes to the group.

23 Q. Okay. So how did the Wolverine Watchman or did they use and

24 specifically related to these three defendants in the

25 courtroom, how did they use or deploy this QRF?

1 A. So they, these defendants created a specific southeast
2 Michigan QRF team.

3 Q. Who was on that?

4 A. Paul Bellar, Dan Harris, our source Dan, Joe was not on the
5 QRF and Pete Musico was not on the QRF. There was -- it
6 evolved from a small handful of operators to a large -- a
7 larger number as Paul Bellar continued to put other members
8 of the Wolverine Watchman into the QRF chat. I think at --
9 at one time, it had about eleven members.

10 Q. Okay. You mentioned a Dan Harris and you mentioned him I
11 think before too, who is he?

12 A. So Dan Harris is a leader in the Wolverine Watchman, he goes
13 by the alias Beeker.

14 Q. And is he a federally charged defendant?

15 A. He is -- he's a former marine and he's charged in Federal
16 court with conspiracy to kidnap Governor Whitmer.

17 MR. JOHNSON: Your Honor I would object to what he's
18 charged with in federal court, it's not relevant here.

19 THE COURT: Response?

20 MS. DODDAMANI: It's certainly most relevant judge
21 in that the charges here are providing material support for
22 terrorism and he is charged with a plot to kidnap the
23 governor in Federal Court at this very moment.

24 THE COURT: I'll overrule it.

25 BY MS. DODDAMANI:

1 Q. So from my understanding from what you're telling me is that
2 Joe Morrison never deployed in the QRF, is that correct?

3 A. That's correct.

4 Q. And neither did Pete Musico, correct?

5 A. That's correct.

6 Q. So Paul Bellar did, didn't he?

7 A. That's correct.

8 Q. Tell me about that?

9 MR. KIRKPATRICK: Your Honor I -- I guess I would
10 like a little more clarification and I'm not trying to be
11 difficult here and we used the word use to my knowledge none
12 of these QRF's ever attacked law enforcement, never attacked
13 the Capi8tal, never attacked anyone, never responded to
14 having to attack someone. So are we talking about that they
15 actually used this QRF or that this QRF was formed in the
16 event that there were an issue in the future and it's -- it's
17 a mis -- respectfully I think it's a mischaracterization when
18 they say used this QRF as opposed to formed a QRF.

19 MS. DODDAMANI: Judge I'm just, about to get there.
20 I think, you know also this is a lot of -- this can be right
21 for cross-examination and they get plenty of time to do that.
22 But right now, I'm still --

23 THE COURT: Well --

24 MS. DODDAMANI: I'm about to go into specific
25 instances where the QRF was deployed with Paul Bellar, two

1 instances in particular.

2 THE COURT: At this point in time, the -- the QRF
3 appears to be in its insynthia stages. I -- I'm not sure
4 that they did anything so if -- if they employed the word use
5 as a -- used as opposed to establish I'm seeing it on -- on a
6 -- as a synonym. They really haven't done anything yet per
7 the testimony.

8 MR. KIRKPATRICK: Forgive me.

9 THE COURT: I'll allow -- I'll allow you to continue
10 the questioning. You certainly can go back over and cross
11 exam this witness, you know what did the QRF actually do
12 other than being formed as a group.

13 MR. KIRKPATRICK: Thank you, your Honor.

14 THE COURT: Did the QRF do anything, but I mean we
15 have to start somewhere on a foundational basis. Go ahead.

16 MR. JOHNSON: Yeah, and I'd like to add you can to
17 what Mr. Kirkpatrick said in support of this supposed
18 terrorism, or kidnapping. Because whatever else they did
19 it's not relevant to support the -- or material to support
20 terrorism that I had the same relevancy objection.

21 THE COURT: Well from a relevancy standpoint, if --
22 I think generally speaking we get some background. I think
23 if someone's hanging around with someone that's been
24 federally charged with wanting to kidnap, kidnap the governor
25 I think it's relevant. It doesn't necessarily mean I really

1 haven't heard any proofs yet that anyone here has supported
2 the people that are fed -- federally charged. In fact, I'm
3 not even sure at this point in time whether providing
4 material support to "terrorist" organization relates to the
5 alleged plotters to kidnap or to material support allegedly
6 to the Wolverine Watchman itself.

7 MS. DODDAMANI: Right.

8 THE COURT: I guess I'm still waiting to see -- see
9 the argument in that regard.

10 MS. DODDAMANI: And judge just to clarify the
11 statute is that you're providing material support to a
12 terrorist or terrorist organization and terrorist are
13 individuals.

14 THE COURT: Yeah, okay.

15 MS. DODDAMANI: And so you know I'm hoping by the
16 end of this judge this will be a lot clearer. It's just
17 taking a while to get through all of the material. I'm
18 trying to do my best to, to go forward.

19 THE COURT: Okay, continue.

20 MS. DODDAMANI: Thank you.

21 BY MS. DODDAMANI:

22 Q. Let's talk about whether the QRF was ever deployed, was it
23 ever deployed, tell me about that?

24 A. Yes, it was, on May 3rd Paul Bellar deployed the QRF for what
25 he perceived was an illegal gun buy that law enforcement

1 might be waiting for him.

2 Q. Okay. Let's take that piece-by-piece. Where did -- when did
3 this happen?

4 A. So on May 3rd, 2020.

5 Q. Where?

6 A. In Genesee County, so in a Home Depot parking lot in Fenton
7 Michigan. The Wolverine Watchman, a member of the Wolverine
8 Watchman was engaged in what they thought was an illegal gun
9 buy.

10 Q. And who was that member?

11 A. That was Alex Davidson.

12 Q. Okay. And how was Alex Davidson related to this case at all?

13 A. Alex Davidson is a member of the Wolverine Watchman, he's a
14 member of the QRF chat and he's a roommate of Ty Garbin in
15 Hartland Michigan.

16 Q. Okay. So you said that the QRF was deployed, was anyone in
17 the courtroom seated today in that QRF deployment?

18 A. Yes, Paul Bellar was present when he deployed the QRF and
19 they responded to that area.

20 Q. Okay. So tell me about that and tell me any actions law
21 enforcement had to take as a result of their deployment of
22 the QRF?

23 A. Sure. So when the QRF was deployed, we deployed our
24 confidential human source with it so my partner and I, Jason
25 responded to the office, debriefed the source, handed off a

1 recording device and started monitoring the communication for
2 the QRF.

3 Q. So you said that that, that they thought it was an illegal
4 gun buy or a set up from the Feds. Who is they, can you be
5 more specific?

6 A. Sure. So the Wolverine Watchman leadership, Pete Musico, Joe
7 Morrison and Paul Bellar had a member of the Watchman who
8 they called Fedboy they believe was a potential federal
9 informant and that -- that -- that person's name is Trent
10 Newcombe. He was offered to sell a firearm to Alex Davidson.
11 Alex Davidson didn't trust that it would be sale; he thought
12 it might be a buy bust and that law enforcement might be
13 coming. So Alex Davidson asked leadership if he could deploy
14 a QRF to help him out and back him up during that gun buy.

15 Q. Okay. So Paul Bellar in that deployment of the QRF for this
16 gun buy?

17 A. He was.

18 Q. Tell me what his role was or what he did or said?

19 A. So he -- he kitted up, he put on his ballistic armor, he got
20 a rifle and he responded to the Home Depot parking lot where
21 he met with other members of the Wolverine Watchman.

22 Q. And what happened?

23 A. Well they started conducting initial surveillance of the
24 surrounding areas and they started watching customers going
25 in and out of Home Depot.

1 Q. Okay. And did Paul Bellar say anything about what they were
2 doing?

3 A. Yes. So Paul Bellar said that if the Feds showed up, he was
4 going to start shooting. He started looking through the
5 scope of his rifle at customers going in and out of Home
6 Depot and wondering if they were Feds or law enforcement that
7 were there for the buy bust.

8 Q. Did you have, did you have to contact any law enforcement
9 locally about this?

10 A. Yes. So as I was live monitoring that we became concerned,
11 and I called the director of Genesee County's Emergency
12 Dispatch, and I told them to hold all responding units from
13 going to the scene. I didn't want any law enforcement
14 officers to inadvertently respond to the scene and get shot
15 by Paul Bellar.

16 Q. Let's talk about any other time that the QRF was deployed.
17 I'm specifically thinking, I'm sorry judge.

18 THE COURT: I -- I think this is probably a good
19 time to break. We're probably one, one minute to twelve so
20 why don't we break now. You can resume with that question
21 and come back at one o'clock, is that goof for everyone?

22 MS. DODDAMANI: Thank you, judge.

23 MR. KIRKPATRICK: Thank you, your Honor.

24 MR. TOWNSEND: Thank you, your Honor.

25 THE COURT: Okay. Thanks a lot, bye, bye.

1 (At 11:59 a.m., recess)

2 (At 1:01 p.m., back on the record)

3 THE COURT: Okay. We're reconvening, we still have
4 the same witness, you remain under oath, same questioner, go
5 ahead.

6 MS. DODDAMANI: Thank you, your Honor.

7 CONTINUED DIRECT EXAMINATION

8 BY MS. DODDAMANI:

9 Q. All right. Good afternoon Agent Impola.

10 A. Good afternoon.

11 Q. Okay. So we were just talking about the gun buy in Fenton
12 and the deployment of the QRF, is that correct?

13 A. That's correct.

14 Q. Okay. Now your -- your -- what you're testifying to here is
15 that based on your observations, is that based on recordings
16 that you listen to, what's that based on?

17 A. So that's based on my live monitoring of a transmitter, which
18 I had on the confidential human source. So not on my
19 observations, on the audio recordings.

20 Q. Okay. And was there a clarification you wanted to make about
21 the audio recording, and what you just testified to about the
22 Home Depot parking lot gun buy?

23 A. Yes, there was. So -- so I stated that I thought Paul Bellar
24 was looking down the barrel of his gun and that was my
25 perception based on the records. I -- I just wanted to say

1 that I wasn't necessarily there to observe what was going on
2 in the vehicle. So I don't know where the guns were located
3 and what was going on there.

4 Q. Okay.

5 MR. KIRKPATRICK: And your Honor, I'd ask that that
6 part be stricken because that will definitely be getting into
7 that on my cross-examination. So I would ask that that
8 testimony be stricken from the record regarding my client
9 looking down the barrel of -- of a rifle or with a telescope,
10 any type of scope on the rifle.

11 MS. DODDAMANI: I have no problem with striking that
12 part of the testimony, but the other parts of that incident.

13 MR. KIRKPATRICK: Absolutely.

14 THE COURT: Right.

15 MS. DODDAMANI: Remain.

16 THE COURT: I -- I agree with Mr. Kirkpatrick, thank
17 you for the clarification, we'll delete the portion about
18 looking down the barrel of a gun.

19 MS. DODDAMANI: Thank you.

20 BY MS. DODDAMANI:

21 Q. So let's talk about the inc -- the deployment of the QRF that
22 we were talking about on May 30th, 2020. What can you tell me
23 about that?

24 A. Well I can tell you that there was BLM, so Black Lives Matter
25 protest going on in Detroit, there was quite a bit of civil

1 unrest in the country at that time regarding law enforcement
2 and Paul Bellar had again called for a QRF to deploy and they
3 met that night at Ty Garbin's house.

4 Q. Okay. So you said Paul Bellar again called for a QRF to be
5 deployed. Did -- did he call for the previous one we talked
6 about on May 3rd or was that Alex Davidson?

7 A. Well Alex Davidson had asked for backup and then Paul Bellar
8 as the leader of the group and specifically the QRF had
9 deployed the QRF.

10 Q. Thank you for that clarification. So now this is the second
11 one, tell me about this, what do you mean that he organized
12 the QRF to respond? Like what for, where to, what was
13 supposed to be happening?

14 A. Sure. So there's a lot going on there, so please stop me if
15 I go off the tracks. But the, Paul Bellar had some friends
16 who were unknown to law enforcement at the time who were down
17 doing surveillance on law enforcement in Detroit and so he
18 called a meeting for the Wolverine Watchman to meet with his
19 friends at Ty Garbin's house.

20 Q. Take us step by step?

21 A. So they put out over Wire that they needed the QRF to
22 respond.

23 Q. Who's they?

24 A. Paul Bellar did, and when responding members went to Ty
25 Garbin's house they were debriefed by Paul's friends who had

1 been in Detroit doing surveillance.

2 Q. Okay. And what was happening at the house with this meeting?

3 A. Well at the meeting they decided what their role in
4 responding to protest would be, and how they would be there
5 to respond to violence encounter law enforcement if law
6 enforcement started shooting protesters. And how they were
7 going to protect Paul's friends who were already doing
8 surveillance in Detroit and any other protesters who might be
9 harmed by police.

10 Q. Okay.

11 A. So they did some recon, Ty Garbin was able to use his job at
12 the airport and his access to flight plans to determine what
13 aerial assets law enforcement had in the air and they
14 selected different locations where they could be snipers
15 without being seen by law enforcements aerial assets.

16 Q. Snipers, describe that?

17 A. Where they could -- they could have a place of cover and
18 concealment on a rooftop is where they were looking, and when
19 I say they I say, I mean the responding members of the QRF
20 including Paul Bellar, and where they could basically be
21 outside of the flight pattern of Michigan State Police
22 helicopter covering the riots.

23 Q. Was there any reference to maps?

24 A. Yes. So they were looking at maps and they were looking at
25 the flight patterns for the maps and then they were looking

1 at the protest routes to try and find an area close to law
2 enforcement where they could respond if protester were shot
3 by police.

4 Q. Okay. And so do they go down to Detroit?

5 A. They did -- they did deploy to Detroit as a QRF.

6 Q. Tell me about that, what were they wearing?

7 A. They were wearing, they kitted up with their ballistic armor
8 and their weapons, they staged in our sources vehicle and
9 they met another vehicle down there.

10 Q. So the source went as well, correct?

11 A. The source went as well and so we live monitored what was
12 going on and then we advised the command post that were set
13 up at the time with the FBI about terrorism subjects were
14 headed that way so they could advise the rest of law
15 enforcement. And we told them about their tactical plans and
16 how they were trying to evade law enforcement in case shots
17 were fired.

18 Q. So what was the point of going down there like this?

19 A. Well they viewed their job to protect citizens who were
20 exercising their First Amendment rights, the freedom of
21 speech from the government. That's what they said their goal
22 was.

23 Q. Any violence occur at this deployment?

24 A. No.

25 Q. I'm sorry?

1 A. No, there was no violence at the event.

2 Q. So I want to shift the focus here from the QRF to other in
3 real life activities. Let's talk about full kit attendance
4 at protest in Lansing. So I'll get to dates exactly and
5 things, but what were protest used for in the group and
6 especially by three, these three individuals in the
7 courtroom?

8 A. So Pete Musico, Joe Morrison and Paul Bellar used the protest
9 for a few different things, one of them being networking with
10 other likeminded individuals. Recruiting to build up --

11 MR. JOHNSON: Your Honor I -- I would object, is he
12 testifying his opinions or is he referencing, I guess
13 foundation is my objection, your Honor.

14 MS. DODDAMAN: I could ask a few clarifying
15 questions.

16 THE COURT: I think a little foundation needs to be
17 established.

18 MS. DODDAMANI: Sure.

19 BY MS. DODDAMANI:

20 Q. Tell me about what -- how -- where you're getting information
21 about the protest, how do you know things?

22 A. So I was live monitoring on Wire, the protest chat and the
23 main chat as the Wolverine Watchman deployed to protest and
24 prepared for protest. They did much of their planning on
25 Wire, so I was able to read their individual communications

1 under their Wire handles and then document them.

2 Q. Okay. And so you're saying that Joe Morrison, Paul Bellar
3 and Pete Musico attended some protest, and we'll get into
4 details of that, is that correct?

5 A. That's correct.

6 Q. Protest are First Amendment activity aren't they, are they
7 not?

8 A. Absolutely.

9 Q. Okay. And so why were you monitoring these individuals that
10 protest in relation to this case?

11 A. These were terrorists' subjects who had stated they wanted --

12 MR. KIRKPATRICK: Judge, I would object to the
13 characterization of terrorist suspects, and your Honor I
14 don't want to belong this -- this hearing but is this
15 foundation about talk on me, Wire, Creation of This group,
16 I've heard nothing, no testimony up to this point that they
17 committed any terrorist acts, which would thus then label
18 them as a terrorist. In their investigation, they may assume
19 they might be terrorists and maybe come engaged in
20 terrorists' attacks, but to label them as a terrorist at this
21 point lacks foundation.

22 MS. DODDAMANI: And judge the agent has testified
23 this is a terrorist, these are terrorist subjects being part
24 of and we have foundation on this, a terrorist enterprise
25 investigation and that's why he's classifying them as

1 terrorist subjects. These are, these are terms of art, I
2 understand counsel's objection.

3 MR. KIRKPATRICK: It's a huge term, your Honor.

4 MS. DODDAMANI: He's got plenty of time and plenty
5 of time to argue in our motion to bind over and plenty of
6 cross-examine.

7 MR. KIRKPATRICK: But I want the record clear your
8 Honor that there's been no showing that they engaged in any
9 terrorists' actions.

10 THE COURT: I -- I understand your objection; I
11 believe his definition of terrorist comes from how the FBI
12 classifies these individuals for purposes of promulgating an
13 investigation. Whether there are -- whether they are
14 terrorist or not is my decision. So it's not going to affect
15 me one way or another.

16 MR. KIRKPATRICK: Thank you.

17 THE COURT: And I would believe that if any portion
18 of this transcript was read upstairs in circuit court if this
19 matter were to be bound over, if that type of language could
20 be stricken.

21 MR. KIRKPATRICK: Thank you, your Honor.

22 THE COURT: Go ahead.

23 MS. DODDAMANI: Thank you, judge.

24 BY MS. DODDAMANI:

25 Q. So we talked about how this protest are generally First

1 Amendment activity. But why were you monitoring these three
2 individuals in relation to protest and their attendance at
3 protest? What was being said and done ahead of them?

4 A. Sure. Well first off, we needed to insure the safety of the
5 citizens who were at the protest and so it's our
6 responsibility as having knowledge about their plans for
7 violence that we're tracking them as they put themselves in a
8 position to commit violence. So when they're subjects of our
9 investigation for terrorism matters my responsibility to know
10 where they're at all times and then advise local law
11 enforcement, and then have law enforcement resources
12 available if they plan to engage law enforcement.

13 Q. So roughly how many protests were these three individuals in
14 attendance at over the -- over this period of the
15 investigation?

16 A. I think it was four to six protest that they attended,
17 somewhere around there.

18 Q. How would they dress when they'd go to protest?

19 A. They generally dress with their ballistic armor and their
20 rifles and their Boogaloo patches that the kit as it were,
21 that we previously described.

22 Q. Okay. So I want to talk about two specific ones. First one
23 I want to talk about is April 15th of 2020, Operation
24 Gridlock. What can you tell me about who attended, what
25 happened at that protest in relation to these three

1 individuals and the Wolverine Watchman?

2 A. Sure. So on April 15th Operation Gridlock Pete Musico, Joe
3 Morrison and Paul Bellar all attended as members of the
4 Wolverine Watchman.

5 Q. Did the source attend?

6 A. The source attended as well, as that was -- that was not
7 recorded.

8 Q. Why wasn't that recorded?

9 A. We just started the investigation, and we hadn't, we had a
10 lot of logistical things to get going as far as notifying law
11 enforcement and we weren't sure at that time whether there
12 was a need to start recording. I mean once, my concept is
13 that once I start recording, I'm going to record everything
14 that I can, and we anticipated a lot more meetings and we
15 didn't know who all the players were on the Watchman. We
16 were still learning their own leadership structure.

17 Q. So you said and made reference to that you -- you monitored
18 Wire and so was there communication about going to the
19 protest before actually going that you could observe and
20 testify to?

21 A. Yes.

22 Q. Tell me about that?

23 A. So I observed on Wire on the days leading up to the fifteenth
24 they're planning about going to the protest and -- they
25 talked about starting the Boog.

1 Q. And let's be specific about who you mean?

2 A. Yes, no problem. So Pete Musico talked about kicking off the
3 Boogaloo at the protest and committing Jihad at the protest,
4 martyring himself and being the first one because of how old
5 he was. Joe Morrison stated that this might be the kicking
6 off of the Boog or the Boogaloo and Paul Bellar said that he
7 was ready to engage law enforcement at the protest. They
8 planned how to dress, how to attend, what weapons to bring
9 and then a Pete Musico reported to our source that he was
10 bringing a grenade.

11 MR. KIRKPATRICK: I guess I would object, your Honor
12 this is not, I -- if this is not a recording. I don't have a
13 problem when -- when interviews with the confidential
14 informant and the agent testifies to that, but when it's not
15 recorded and something that I can't go back and look at,
16 that's hearsay. If we're going to have the informant testify
17 and I think he'd be an appropriate witness to testify in
18 regard to any statements made that were not recorded. And I
19 guess that's a running objection that I would make going
20 forward. We know there's a lot of recordings with the
21 informant, we got those recordings, we understand what was
22 said and how it was said. But if the officers going to or
23 the agents going to testify to statements made by his
24 informant that are not recorded, they're hearsay and I would
25 object to those.

1 MR. DODDAMANI: Well they're not hearsay judge if
2 they are against, if they are pre-admission, party opponent
3 is putting in --

4 MR. KIRKPATRICK: My clients not conspirator.

5 MR. DODDAMANI: So if he heard statements or he read
6 statements from these individuals, just cause they're not
7 recorded doesn't make them hearsay.

8 MR. KIRKPATRICK: Reading, your Honor I'm sorry to
9 interrupt the Court. He's got something he read on Wire I'm
10 not objecting to that. If it's something that the informant
11 said to the agent based upon a meeting or based upon what
12 they spoke of that's not recorded, that's hearsay. That is
13 the part that I'm objecting to.

14 MR. DODDAMANI: That's fair, I -- I have no problem
15 with that judge.

16 THE COURT: Okay.

17 MR. DODDAMANI: I'll just clarify with the agent.

18 THE COURT: Sustained.

19 MR. KIRKPATRICK: Thank you, your Honor.

20 BY MS. DODDAMANI:

21 Q. Could you clarify for us?

22 A. Sure. So the events leading up to the protest and the
23 discussion I'm testifying about are communication on Wire.
24 The statement about the grenade that was made to the
25 informant, so I didn't read that on Wire.

1 Q. Okay.

2 A. That would be the hearsay you're talking about.

3 Q. Okay. Was there ever any statements by Mr. Bellar about

4 Molotov cocktails?

5 A. Yes.

6 Q. Was that something that you observed or heard or saw?

7 A. Yes so, I observed those on Wire as it was happening.

8 Q. What was that about and when was that, when did that happen?

9 A. So Paul Bellar on, initially on April 22nd so following the

10 first protest stated that if the governor extended the

11 orders, he would Molotov her house.

12 Q. Okay. So --

13 MR. KIRKPATRICK: So, I just want some clarification

14 your Honor. When you're talking about the Molotov cocktail,

15 you're talking about the statement being made previous to

16 this rally. He didn't make that statement at the rally, it's

17 the statement that we showed in the exhibit a minute ago

18 where he was upset that the shutdown had continued?

19 THE WITNESS: That's correct, yes.

20 MR. KIRKPATRICK: It wasn't made at the rally

21 though, is that correct?

22 THE WITNESS: That's correct.

23 THE COURT: Go ahead.

24 MS. DODDAMANI: Can I continue, thank you.

25 BY MS. DODDAMANI:

1 Q. All right. So at this protest they did in fact go, is that
2 correct?

3 A. That's correct.

4 Q. Did any violence occur?

5 A. No.

6 Q. Did anything of note happen with these three subjects?

7 A. During the protest and following the protest on Wire Pete
8 Musico stated that he wanted to get close to MSP and try to
9 get them to touch him.

10 Q. And MSP is?

11 A. Michigan State Police.

12 Q. Thank you, okay. So I am going to ask you about after this
13 protest, was there a training that occurred on the Munith
14 property on 4-19-20?

15 A. There was.

16 Q. So this is four days later, a tactical training, is that
17 correct?

18 A. That's correct.

19 Q. Okay. And so what can you tell me about this?

20 A. So I can tell you at the tactical training they --

21 Q. Who's in attendance related to these three individuals in the
22 courtroom?

23 A. So Pete Musico, Joe Morrison and Paul Bellar were in
24 attendance at the tactical training and of concern to us was
25 their practice with center breeching doors and offensive

1 breeching into structures similar to the Capital Building,
2 which they had just been at a protest.

3 Q. Okay. And at -- up to this point was there any discussion
4 about breeching the Capital?

5 A. There was.

6 Q. By whom?

7 A. By Pete Musico and Joe Morrison and Paul Bellar.

8 Q. Okay. Now was this training recorded on April 19th?

9 A. It was not.

10 Q. Okay. And anything else of note at this training?

11 A. Not that I can recall.

12 Q. Okay. Did you then -- did you then start recording as much
13 as you could after this point?

14 A. Yes, so after the April 19th training, we started, we
15 initiated recording beginning on April 30th.

16 Q. And why was that?

17 A. Because of the level of danger the Wolverine Watchman posed
18 to the public at these protests and the escalation of their
19 plans.

20 Q. Okay. Now let's talk about April 30th, 2020. What's
21 happening at the Michigan Capital on that day?

22 A. So there was some sort of legislative session in place in
23 which they were talking about the emergency orders or
24 extending the emergency orders or the governors' powers or
25 something to that affect going on at the Capital.

1 Q. Okay. And did you monitor, live monitor this?

2 A. I did.

3 Q. Okay. And how, through the -- through Dan, did he go?

4 A. Yep. So Dan wore a transmitter and I monitored it live

5 during the, during the protest.

6 Q. Okay. And who attended this protest on that day?

7 A. So Pete Musico, Joe Morrison and Paul Bellar attended this

8 protest.

9 Q. Okay. And where was it at?

10 A. It was at the Capital.

11 Q. Okay. Is this the one we've seen in the news and heard about

12 where people entered the Capital building with firearms?

13 A. Yes, this is.

14 Q. Okay. Now before entering, based on your observations what

15 was happening before entering the building in relation to

16 these three individuals?

17 A. Well the Wolverine Watchman, these three individuals were in

18 a car outside the Capital, and they were talking about

19 storming the Capital. They were trying to talk about

20 different ways to tactically get behind a crowd and get

21 people to push their way into the Capital. They were talking

22 about the placement of MSP officers, and how they could

23 engage or start the Boogaloo.

24 Q. Did they talk at all about breaching the building as a team?

25 A. They did.

1 Q. Did they talk about tactics such as stacking up?

2 A. Yes, they did.

3 Q. What does that mean?

4 A. Well stacking up is generally speaking what law enforcement
5 or the military would do on a door prior to going in. So
6 you'd get your team ready, you'd have your team assignments
7 to breach the door, and then you would stack up on the door
8 that you're trying to enter.

9 Q. And did Pete Musico talk at all about the governor?

10 A. Yes, he did.

11 Q. What did he say?

12 A. He said let's see what happens, and I'm paraphrasing here, he
13 would -- he talked about trying to get the governor as she
14 escaped the back entrance when the crown got into the -- into
15 the a -- into the Capital and he talked about let's get that
16 bitch when she's leaving.

17 Q. Okay. What did you have to do as a result of this; did you
18 have to notify law enforcement at all?

19 A. Yeah, so immediately our source notified us at the
20 seriousness of the event, and we notified MSP Command staff
21 and those at the Capital of what was going on and the
22 identities of the Wolverine Watchman there and what they were
23 wearing.

24 Q. And did all three of these individuals go into the Capital
25 Building armed?

1 A. They did.

2 Q. Okay. And based on your observations and what you were
3 hearing and live monitoring what happened inside of the
4 building?

5 A. Well it's pretty chaotic inside the building so first off, I
6 just want to say that it was hard over the transmitter to
7 hear so I was monitoring various Facebook live feeds and
8 various news feeds that were going on. In addition to just
9 the transmitter on the source. While they were inside Pete
10 Musico was at the front of the line confronting MSP, Michigan
11 State Police Troopers, calling them red coats or turncoats,
12 yelling at them. And then at one particular time Pete took
13 out his phone and appeared to take a picture or video of a
14 trooper's badge and name.

15 Q. And did that concern you?

16 A. It did.

17 Q. Why?

18 A. Well because he had previously talked about tracking down law
19 enforcement officers and throwing Molotov cocktails into
20 their house and killing them and you know this seemed to be a
21 way to document a trooper's name who is unaware of what, who
22 he was.

23 Q. Okay. Anything else?

24 A. They -- they talked about finding the governor's office and
25 they staged up in front of what they thought was the

1 governor's office.

2 Q. Is that inside of the Capital Building?

3 A. It is.

4 Q. Okay. When you said staged up in front of the governor's

5 office what do you mean?

6 A. I mean they stood in front of the door with their rifles and

7 allowed the press to take pictures and then our informant Dan

8 took a picture of them in front of the office.

9 Q. Okay. I'm going to get; I'm going to direct your attention

10 to exhibit fifteen A through E. Take a look at those please,

11 as well as sixteen?

12 A. All right, I have them.

13 Q. And can you tell me about those, what they are?

14 A. Sure. So these are photographs either screen captures,

15 captures that I did or publicly available photographs or

16 photographs that our source Dan took from inside the Capital

17 that day on April 30th, 2020.

18 Q. Okay. Can you tell me what sixteen is?

19 A. Sure. Sixteen is a screen capture of a Wire chat, which

20 includes a photograph of Paul Bellar and some statements that

21 Paul and Pete made.

22 Q. Okay. And are they fair and accurate?

23 A. They are.

24 Q. Thank you.

25 MS. DODDAMANI: I'm going to move for their

1 admission?

2 THE COURT: Okay.

3 MR. KIRKPATRICK: No objection.

4 MR. SOMBERG: No objection.

5 MR. JOHNSON: No objection.

6 THE COURT: Okay.

7 MR. BALLARD: Your Honor I would object to the
8 relevance of these.

9 THE COURT: Well, well okay, this, this is the first
10 time, so I'll give you a pass. Are you objecting or not
11 because I can't have two people speaking?

12 MR. BALLARD: Your Honor I would object to the
13 relevance of these. They were engaged in a lawful protest;
14 there were no charges that came from this. They were
15 photographed obviously by the news and everything. And I
16 don't -- I don't see the relevance of them attending a large
17 gathering of people exercising their First Amendment to
18 protest.

19 MS. DODDAMANI: Your Honor, the relevance that goes
20 to intent.

21 THE COURT: Yeah.

22 MS. DODDAMANI: They're charged here and they're
23 intent is extremely relevant. So all the actions that they
24 are doing at the Michigan Capital on that day are extremely
25 relevant.

1 THE COURT: I'll overrule the objection; singularly
2 lawful activities can be admissible in certain circumstances
3 for purposes of establishing intent so go ahead.

4 MS. DODDAMANI: Thank you your Honor. So the
5 exhibits are admitted judge.

6 THE COURT: Yes.

7 MS. DODDAMANI: Thank you.

8 (At 1:25 p.m., PX 15 and PX 16 admitted)

9 BY MS. DODDAMANI:

10 Q. I'm going to show fifteen A please. Can you tell me what
11 that is?

12 A. Yes, this is a photograph my source Dan took of the Wolverine
13 Watchman, specifically the three defendants staged in front
14 of what they thought was the governor's office inside the
15 Capital.

16 Q. And a who in the courtroom today is present in this photo?

17 A. So Pete Musico is present on the far right with his rifle
18 index towards the ground with the camo. Paul Bellar is the
19 second from the right with his rifle index towards the ground
20 with the American flag mask and Joe Morrison is wearing a
21 flannel shirt with his rifle index towards the ground and
22 he's third from the right.

23 Q. Thank you. Fifteen B please, what's this?

24 A. This is a photograph of Pete Musico inside the Capital on
25 April 30th. You kind of see in the background Michigan State

1 Police officers in a line protecting the nonpublic areas of
2 the Capital.

3 Q. Thank you. Fifteen C.

4 A. This is a screen capture I took of a live news feed in which
5 Pete Musico was using his phone to document what appeared to
6 be the badge and name of a Michigan State Police trooper.

7 Q. Thank you. Fifteen D?

8 A. This is a photograph of protesters at the line of MSP, and
9 this is Adam Fox here with the Hawaiian shirt and the hat on
10 backwards and the Amanda Keller his girlfriend is right next
11 to him.

12 Q. Okay. Tell us who Adam Fox is?

13 A. So Adam Fox is the leader of the Michigan Regiment of the
14 Second Continental Army. He's charged with conspiracy to
15 kidnap Governor Whitmer, and he was a co-conspirator who
16 engaged in plotting and attacks with the Wolverine Watchman
17 including these three defendants.

18 Q. Okay. We will get into the contact Adam Fox had at a later
19 date. But at this point in time do you have any knowledge of
20 whether Adam Fox knew any of the individuals seated in the
21 courtroom today?

22 A. So based on my monitoring of the chats and the communications
23 they had not met each other.

24 Q. Okay.

25 A. They recognized each other from this protest.

1 Q. Okay. Fifteen E, is this a duplicate?

2 A. This is another photograph of basically the same thing where
3 you can see Amanda Keller a little bit better on the bottom
4 right.

5 Q. Okay. Let's go to sixteen, give us some context for this?

6 A. Sure. So this is a photograph of Paul Bellar inside the
7 Capital and it's a screen capture from Wire so it's after
8 Paul posted this picture on Wire.

9 Q. So this is after the protest?

10 A. It was on 4-30.

11 Q. Okay.

12 A. So I don't know if it was directly after or during the
13 protest.

14 Q. Okay. And what is this picture?

15 A. This picture is Paul Bellar in full kit on the second floor
16 of the Capital pulling rear guard or rear security.

17 Q. Was this on Facebook or was this on Wire, how was this stuff
18 posted?

19 A. So this was posted by Paul to Wire to their main chat to
20 every member of the Wolverine Watchman.

21 Q. Okay. And what is relevant about the discussion underneath
22 the picture, if -- if you want, we can magnify it there for
23 you?

24 A. Sure. So, so Grandpa, which is Pete Musico says gotta be the
25 loner, Paul Bellar said I, someone's got to pull rear

1 security otherwise who'd be watching for fuckers coming in.
2 Paul Bellar then states besides it was all just rattling
3 sword hilts the whole time. No one had the balls to do shit
4 and if we did, the bootlickers would have turned on us.
5 Grandpa, which is Pete Musico, says yeah, I know, I really
6 want to start it, but I don't know if anyone else, in other
7 groups. I was trying to get them to touch me.

8 Q. All right. I'm going to shift gears here from that protest
9 to the leadership structure. We talked about leadership
10 structure early on here, but did the, did there come a time
11 when leadership structure formalized?

12 A. There did in early June there was a formal rank and structure
13 that was established.

14 Q. So when, did membership numbers increase in Wolverine
15 Watchman by June?

16 A. Yes, so as a result of the recruiting from Joe, Pete and Paul
17 there was a drastic increase in both the Facebook and then
18 the Wire chats and then those who had been vetted into the
19 group.

20 Q. So roughly how many are we talking at that point?

21 A. Well they got up to about a hundred and fifty people on
22 Facebook and then they vetted forty to fifty people into the
23 Wolverine Watchman, but they, not all of them had attended
24 training at that time?

25 Q. Okay. So let's talk about a meeting that occurred on June

1 3rd, 2020, what can you tell me about this meeting in relation
2 to what it meant about leadership structure?

3 A. Sure. So Paul Bellar --

4 Q. And was it recorded, sorry.

5 A. Oh I'm sorry, yes it was a recorded meeting, our source Dan
6 was there, and I was monitoring the meeting live. It -- it
7 was a meeting at Ty Garbin's house that Paul Bellar called.
8 Joe Morrison was there, Pete Musico was not at the meeting.
9 Joe was there with his wife, Paul was there, other leadership
10 in the Watchman, Dan Harris was there, Ty Garbin was there,
11 and our source Dan was there.

12 Q. What was the purpose of the meeting?

13 A. Well the purpose of the meeting as it turned out was to
14 discuss Joe's national contacts and opportunities the
15 Wolverine Watchman had to network as well as to establish a
16 formal structure and discuss the need for mandatory training.

17 Q. Was there discussion particularly among these three
18 individuals about other militias in the nation?

19 A. There was.

20 Q. Tell me about that?

21 A. So Joe brought up his national contacts and stated that he
22 knew folks in Delaware and across the country who invited
23 them to Dublin Ohio for a national militia conference.

24 Q. Okay. Was there discussion of other things like operational
25 security?

1 A. Yes. So operational security was something that Joe preached
2 about at this meeting and regularly brought up ultimately
3 based on operational security the Wolverine Watchman decided
4 not to go to Dublin for the National Militia Conference
5 because they thought that if arrests were made it would take
6 out most of the leadership structure.

7 Q. Okay. So let's talk about, give us some awareness now at
8 this point about what else is happening at this with
9 investigations that end up intersecting with this one?

10 A. Sure. From the FBI through the domestic terrorism operation
11 center I was aware of other FBI investigations in Baltimore
12 and Milwaukee and Cincinnati and Indiana involving other
13 militia members or boogaloo members who were attending the
14 national conference in Dublin.

15 Q. So what, like how does this intersect with the Wolverine
16 Watchman and the three individuals in the courtroom?

17 A. Well the Wolverine Watchman were invited to; Joe Morrison was
18 specifically received the invite -- invite on behalf of the
19 Wolverine Watchman to go to Dublin. He was known in the
20 national militia community who knew who the Wolverine
21 Watchman were, and they were invited to be part of it.

22 Q. So other people have this meeting in Dublin Ohio and what's
23 the date of that meeting?

24 A. The date of that meeting is June 6th, 2020.

25 Q. And what's it for?

1 A. The purpose of the meeting was to initiate a three-phase plan
2 as far recruitment, attack planning and attacks in states
3 across the union to be simultaneous to send a message to
4 tyrannical governors.

5 Q. So for what purpose?

6 A. Political violence.

7 Q. And was anyone in this courtroom aware of the meeting and the
8 content of that meeting?

9 A. Well I can tell you that Joe Morrison stated he was aware,
10 I'm not sure exactly what he was aware of, but he said he
11 knew it was going on.

12 Q. And what were the topics that were discussed at this meeting
13 in Dublin Ohio?

14 A. Well in Dublin Ohio they talked about Barry Croft.

15 MR. JOHNSON: Your Honor, I'm going to object to
16 relevance, if they didn't go.

17 THE COURT: I, yeah I --

18 MR. SOMBORN: Same objection.

19 MS. DODDAMANI: It's, it's relevant judge for this
20 reason. The conspiracy at this point among many members, any
21 individuals has started for the -- for the commitment to
22 political violence and now there is a meeting in Ohio for
23 which we've gotten testimony here from Agent Impola that Joe
24 Morrison is aware of what happened at that meeting. What is
25 happening at that meeting is relevant for the purpose of what

1 they do later and what Joe Morrison does. Which is as the
2 testimony will reveal combine forces with various individuals
3 to perpetuate those plans. So what is happening at that
4 meeting is extremely relevant for the rest of what's
5 occurring now because that is terrorism. What is happening
6 at that meeting, the discussion of it, and then from there
7 the support that's provided by these three individuals stems
8 back to what's happening at that meeting.

9 THE COURT: Well not, not --

10 MR. JOHNSON: And your Honor we don't believe that
11 to be true.

12 THE COURT: --none of that --

13 MR. JOHNSON: I'm sorry I don't mean to cut you off.

14 THE COURT: Go ahead.

15 MR. JOHNSON: We don't think that to be true, I
16 believe the agent testified that he's not sure that Joe
17 Morrison knew what was going on, and you can't be in a
18 conspiracy about a crime you didn't know about, that hadn't
19 happened yet.

20 MS. DODDAMANI: And I'm going to lay that foundation
21 judge, and I'm going to show that we have screen shots and
22 evidence that we're going to admit here shortly that
23 discusses how Joe Morrison knew what was happening and his
24 support of that, of those plans.

25 THE COURT: Well I think you need to alter your

1 questioning then. It's already into the record that there
2 was a Dublin meeting and what the Dublin meeting was about.
3 I was kind of curious how he knew about it, but in any event,
4 there was also testimony that he didn't know what Joe
5 Morrison knew.

6 MS. DODDAMANI: Let me clarify judge, if I could?

7 THE COURT: Okay.

8 MS. DODDAMANI: All right.

9 BY MS. DODDAMANI:

10 Q. Did Joe Morrison know about what was going on in Dublin Ohio?

11 A. Joe Morrison stated he knew what was going on in Dublin Ohio.

12 Q. Okay. And did he do that through various meetings that you
13 monitored, Wire Chat, things of that nature?

14 A. Well he talked about it on Wire and Facebook and then he had
15 a number of meetings with the leaders of Dublin Ohio who came
16 back to Michigan as well as he had continued contact with the
17 leader who set up Dublin Ohio, Barry Croft.

18 Q. Okay. What about, who was in Michigan representative in --
19 that had attended the Dublin Ohio meeting?

20 A. Well there were two people from Michigan, Bill Knoll and Adam
21 Fox and actually Amanda Keller, so three from Michigan who
22 attended Dublin Ohio and at Dublin Ohio Adam Fox was names
23 the official representative of Michigan for the second
24 regimen to the Michigan Continental Army.

25 Q. Okay. So I'd like you to take a look in the binder at

1 exhibits seventeen, eighteen and nineteen.

2 A. I've got them here.

3 Q. Okay. And tell me what these are?

4 A. These are screen captures of Wire Chat from the Leadership
5 Chat in which Joe Morrison and Paul Bellar are engaged in.

6 Q. Okay. And so that's seventeen, what about eighteen? Can you
7 lay a foundation too for like what is the date that this is
8 going on?

9 A. Sure. So --

10 Q. For seventeen?

11 A. Exhibit seventeen is June 9th, 2020, it's a screen capture of
12 a Wire Chat with Watchmen leadership Dan Harris and Joe
13 Morrison.

14 Q. Okay.

15 A. Exhibit eighteen is a leadership chat from June 12th, 2020
16 with a screen, screen capture with Joe Morrison, my informant
17 Dan, Dan Harris and I'm just looking, that was A., I'm
18 looking at B, which is a continuation of the same screen
19 capture which also has Ty Garbin and Paul Bellar in it.

20 Q. Okay.

21 A. On a B.

22 Q. Okay. Number nineteen?

23 A. Nineteen is another continuation of Wire Chat, this one is a
24 direct message between our source Dan and Joe Morrison from
25 June 12, 2020.

1 Q. Okay. Are these fair and accurate?

2 A. They are.

3 MS. DODDAMANI: I'm going to move for their
4 admission judge.

5 MR. KIRKPATRICK: I have no objection.

6 MR. JOHNSON: No objection your Honor.

7 MR. SOMBERG: I have no objection.

8 THE COURT: Okay. Seventeen, eighteen and nineteen
9 will be admitted.

10 MS. DODDAMANI: Thank you your Honor.

11 (At 1:39 p.m., PX 17, PX 18, PX 19 admitted)

12 BY MS. DODDAMANI:

13 Q. Could you put seventeen up please, okay? So we talked about
14 did you have knowledge, did Joe Morrison know what's
15 happening in Dublin Ohio on June 6th, 2020, which is the
16 meeting you referenced in Dublin Ohio, correct?

17 A. That's correct.

18 Q. Okay. So what does this tell us about that?

19 A. Well this is Joe's statement that I was referencing from
20 Wire, so this is June 9th when Joe using the alias Boog Daddy
21 Bunyan stated oh by the way the meeting in Columbus went real
22 well, and I have a contact here we need to do a meeting with.
23 This is some real shit guys. Beeker, which is Dan Harris,
24 stated oh good. Joe Morrison stated like real deal get shit
25 done motherfuckers.

1 Q. Okay. Can you put up eighteen A please? This one is a
2 little smaller, but what can you tell me about this in
3 relation to whether this tells us anything about whether
4 Wolverine Watchman knew about the meeting in Ohio?

5 A. Well this is Joe Morrison talking about a future meeting with
6 Adam Fox in Grand Rapids. So he said anybody down for a trip
7 to G.R. next Saturday for a meeting?

8 Q. What's in G.R. and what is G.R.?

9 A. G.R. is Grand Rapids and Adam Fox is from Grand Rapids. He
10 has a business there and that's where he lives.

11 Q. Thank you, continue?

12 A. Dan Harris says possibly, our source Dan says what kind of
13 meeting, I may be down, time-share, Dan Harris says
14 definitely a time-share. And Dan says beach body, Beeker
15 said, Dan Harris said Dad bod; Joe Morrison says yes, a time-
16 share.

17 Q. Hang on one sec. What's a time-share?

18 A. Well they're just talking about like a vacation, a lot of
19 times they don't want to actually say for operational
20 security what it is so they're able to kind of get everybody
21 on the same page.

22 Q. Okay. Continue.

23 A. Then Harris says I'll go for the free weekend, Joe Morrison
24 says sent you all the voice clip from my contact Adam.

25 Q. And who's he referencing here?

1 A. He's referencing Facebook, a voice clip from Adam Fox.

2 Q. Okay. Continue?

3 A. Dan says I don't think I got it, how did want get in on that,

4 I don't see a voice clip. Joe Morrison says FB meaning

5 Facebook. Dan Harris says lots of emphasis on

6 hypothetically. Dan says roger, been offline, sounds like

7 we're going to G.R.

8 Q. I'm going to show you this fifteen B, eighteen B, sorry,

9 eighteen B.

10 A. So this is a continuation of the same post.

11 Q. And what's relevant in this, I mean you have it in front of

12 you too so if you?

13 A. Sure.

14 Q. If there's stuff that's not relevant you don't have to read

15 it all.

16 A. So after they take --

17 MR. KIRKPATRICK: Your Honor I would prefer that

18 everything be read, if he's -- if he's referencing an

19 exhibit, I don't want us to be picking and choosing what's

20 read. It's going to get read, all this read in its entirety.

21 MS. DODDAMANI: That's fine, that's fair enough, go

22 ahead.

23 THE COURT: I think -- I think that fair if he's

24 been reading everything into the record anyways, stay with

25 consistency, go ahead.

1 BY MS. DODDAMANI:

2 A. Okay. So it starts sounds like we're going to G.R., Dan
3 Harris says guess so, Joe Morrison says I'll keep you all
4 posted the deets, Paul Bellar says all right, Dan Harris says
5 Doc want to carpool, Joe Morrison says can anyone grab me,
6 I'll throw gas. Ty Garbin says a basement sounds pretty
7 shady LOL.

8 Q. Continue please, the next section?

9 A. So after Ty Garbin, this is a continuation on the same post.
10 After Ty Garbin says a basement sounds pretty shady LOL, Dan
11 Harris says I can, Dan says I've seen that in a movie before,
12 I'm not trapped in a room with them they're trapped in a room
13 with me, Dan Harris says gay, but yeah @ Boog Daddy Bunyan I
14 can grab you @Doc 17176.2 will probably be rolling with me.
15 Paul Bellar says sure at Beeker and yeah, a basement, if the
16 FBI raids you can just say we were having kinky gay dungeon
17 butt sex.

18 THE COURT: I got to ask what does -- what does that
19 have to do with the Dublin meeting?

20 MS. DODDAMANI: I'm sorry, judge?

21 THE COURT: I -- I thought you said that this, this
22 exhibit evidenced some type of awareness of the Dublin
23 meeting?

24 MS. DODDAMANI: Right judge, there was a reference
25 to Ohio, there was a reference.

1 THE COURT: On eighteen B?

2 MS. DODDAMANI: No judge, that was on a seventeen
3 judge, can we pull up seventeen?

4 THE COURT: Okay.

5 MS. DODDAMANI: There -- there's a reference, tell
6 me about Columbus, there's, it says here that Joe Morrison
7 typing out about a meeting in Columbus. Where is Columbus in
8 relation to Dublin Ohio?

9 THE WITNESS: Columbus is just north of Dublin Ohio
10 and they referred to the Dublin meeting, I refer to it as the
11 Dublin meeting because it's technically in Dublin, but it was
12 actually in Columbus.

13 BY MS. DODDAMANI:

14 Q. Okay.

15 A. Near Columbus.

16 THE COURT: Now I'm going, I miss understood I
17 thought seventeen, eighteen and nineteen were all being
18 presented to substantiate knowledge of the Dublin meeting and
19 eighteen didn't sound like it.

20 MS. DODDAMANI: Right. Well eighteen judge, if we
21 could pull eighteen A back up. Eighteen references Adam Fox
22 --

23 THE COURT: Grand Rapids.

24 MS. DODDAMANI: And from the testimony.

25 THE COURT: Okay.

1 MS. DODDAMANI: I know there's so many people here
2 and it gets really confusing, but from the testimony of
3 Impola, Adam Fox was appointed the Michigan contact from that
4 meeting.

5 THE COURT: Okay.

6 MS. DODDAMANI: And so at this point by June, by
7 June 12th now Morrison is having discussions with his
8 leadership about reaching out to Adam Fox and having a
9 meeting in Grand Rapids.

10 THE COURT: Okay. Okay, continue.

11 MS. DODDAMANI; Thank you.

12 BY MS. DODDAMANI:

13 Q. So now I'm going to ask you, now that we've set this
14 foundation, I'm going to ask you what was discussed at the,
15 at the meeting in Dublin Ohio that we referred to on June
16 6th, 2020, what were the topics that were discussed?

17 A. Sure. So Barry Croft brought up to the -- to the meeting
18 attendees about different types of political violence. They
19 talked winning the hearts and minds of people in the United
20 States by killing law enforcement officers and FBI agents.

21 MR. JOHNSON: At this point, I will object, there's
22 no connection between Barry Croft and particularly Pete
23 Musico or anybody that's at this table at this point. It --
24 it's irrelevant your Honor.

25 MR. KIRKPATRICK: I would join that objection.

1 THE COURT: Can you, I guess I don't, I'm a little
2 bit unclear. I -- event he exhibits, it doesn't really flesh
3 out the fact that Joe Morrison you know had a complete
4 thorough knowledge of that meeting.

5 MS. DODDAMANI: Right judge, we're making inferences
6 here. He is clearly reaching out --

7 THE COURT: Well look --

8 MS. DODDAMANI: To attendees in the meeting.

9 THE COURT: Granted he's reaching out but once again
10 we're getting back -- back to the fact that none of these
11 three at the Dublin meeting.

12 MS. DODDAMANI: Yes judge.

13 THE COURT: Okay. And there was a prior objection
14 and the agent said well you know I don't know what, basically
15 he said I don't what Morrison knew and I -- I thought we were
16 laying some additional foundation to show Morrison had an
17 awareness of what was going on at the Dublin meeting and I --
18 I'm not picking that up from the exhibits.

19 MS. DODDAMANI: Right judge. Some of the exhibits -
20 - the exhibits are referencing that this is the real shit
21 action that they're talking about, these are the real deals
22 motherfuckers. There's various statements where he is
23 talking about knowing what the content of that meeting is
24 through his references to meetings in the future with Adam
25 Fox who is the representative that attended that meeting. I

1 -- I can continue and lay a foundation judge, there is more I
2 can get into if we could circle back to this if that's the
3 Courts preference?

4 THE COURT: Yeah, I -- I'm not convinced right now
5 that you got an adequate foundation, but you know.

6 MS. DODDAMANI: Okay.

7 THE COURT: Go through the Dublin meeting blow by
8 blow.

9 MS. DODDAMANI: That's fine. Thank you, judge.

10 BY MS. DODDAMANI:

11 Q. All right. So let's talk about, hang on. Okay. So we
12 discussed Morrison's awareness in relation to these exhibits.
13 You can take that down now, thank you. Let's go back now and
14 you gave us some awareness of the bigger picture of what's
15 happening in other places, is that correct?

16 A. That's correct.

17 Q. All right. Let's go back here to Michigan, to Munith and
18 let's talk about other real like, life activities. I want to
19 center right now on a training that was conducted in Munith
20 on June 14th, 2020. Okay, was that recorded?

21 A. That was.

22 Q. Okay. Were you monitor -- were you monitoring that one?

23 A. I was.

24 Q. Okay. And what was this training built as by whom in the
25 group?

1 A. So by Joe, Pete and Paul, this training was a mandatory
2 training in which they were going to call the ranks. In
3 other words if you didn't show up at the training or you
4 didn't have a good excuse, if you weren't a contributing
5 member and you had been vetted then you were going to be
6 kicked out of the group.

7 Q. Whose idea was that?

8 A. That was Paul Bellar's idea.

9 Q. Okay. And at this training, at this training what happened?

10 A. Well at this training they engaged in tactical training, so
11 they engaged in vehicle ambushes and a kill house tactics and
12 then during the training Pete and Joe had individual
13 conversations with Dan our source about what was going on in
14 Dublin Ohio.

15 Q. Okay. So when you say the tactical was happening at this
16 meet, at this meeting, at this training are we talking about
17 the same sort of activities that we discussed earlier with
18 offensive tactics?

19 A. That's correct.

20 Q. Are we talking about full kit training with firearms?

21 A. That's correct.

22 Q. Okay. And possessing firearms (inaudible) training?

23 A. That's correct.

24 Q. All right. And you mentioned that -- that Joe Morrison and
25 Pete Musico, did they make, did they reference in this

1 training any attempt to coordinate with Fox and any effort?

2 A. Yes. Pete Musico said, excuse me stated that he knew who

3 Adam Fox was and what his plan was about.

4 Q. Okay. And did he -- did -- did Mr. Musico talk about making

5 contact with Adam Fox?

6 A. Yes. Mr. Musico said he'd heard from Adam Fox and he asked

7 Joe if Joe knew what Adam Fox was about.

8 Q. Okay. And was there anything specific referenced about that

9 contact?

10 A. Yes. So Pete stated that he knew --

11 MR. JOHNSON: Your Honor I -- at this point I would

12 object. If -- if he's reading something we need to know, if

13 this subject heard, that's foundation your Honor.

14 MS. DODDAMANI: I laid that foundation with the

15 recording and the monitoring.

16 THE COURT: Okay. Go ahead.

17 THE WITNESS: Yeah, so I was live monitoring this

18 and these are statements made on an audio, audio recording.

19 Pete stated he knew the recording was about kicking off the

20 Boogaloo, excuse me not the recording. He knew the meeting

21 and Adam Fox was about kicking off the Boogaloo.

22 MS. DODDAMANI: Okay.

23 THE WITNESS: And he asked Joe if Joe knew that too

24 and Joe stated he did. He knew what was going on.

25 BY MS. DODDAMANI:

1 Q. And was this in the middle of training?

2 A. Yes, it was, it was during a lapse in training, training was
3 still going on.

4 Q. Okay. And after -- after this conversation was there further
5 conversations as a group about this concept?

6 A. Yes. So Joe Morrison played the audio clips that Adam Fox
7 had sent him on Facebook and then they made a decision as a
8 group to contact Adam Fox and had a conference call with him
9 following the training.

10 Q. Did you hear that voice mail clip that you're referencing?

11 A. I did.

12 Q. What was that about?

13 A. Adam Fox made a reference to his national contacts and said
14 he wanted to meet up with them.

15 Q. Okay. And who was playing this voice mail for the rest of
16 the group?

17 A. Joe Morrison.

18 Q. Okay. And who's present when Joe Morrison's playing this
19 voice mail?

20 A. So Pete Musico, Paul Bellar and Joe along with other members
21 of the Wolverine Watchman including our source Dan.

22 Q. Okay. Now you previously listened to an audio clip, we'll go
23 to exhibit twenty and exhibit twenty-one, is that correct?

24 A. I have.

25 Q. And is that, what -- what are those, set up exhibit twenty

1 for us?

2 A. Exhibit twenty is a clip from a longer audio recording that I
3 live monitored of the mandatory training on June 14th, 2020 in
4 Munith Michigan.

5 Q. And what about exhibit twenty-one?

6 A. It's another clip of the same training, it's a shortly
7 thereafter, it -- it follows the first clip.

8 Q. Okay.

9 MS. DODDAMANI: I'm going to move for their -

10 BY MS. DODDAMANI:

11 Q. Are, are they fair and accurate?

12 A. They are.

13 Q. Okay.

14 MS. DODDAMANI: I'm going to move for their
15 admission at this time.

16 MR. KIRKPATRICK: I have no objection.

17 MR. SOMBERG: No objection.

18 THE COURT: No objection, your Honor.

19 THE COURT: Okay then, twenty and twenty-one are
20 admitted.

21 (At 1:53 p.m., PX 20, PX 21 admitted)

22 MS. DODDAMANI: Thank you. I'm going to play
23 exhibit twenty for the Court.

24 THE COURT: Okay.

25 MS. DODDAMANI: And you know we're doing our best

1 with the tech here judge, so bear with us.

2 THE COURT: Yeah, I appreciate the efforts.

3 MS. DODDAMANI: Thank you.

4 (At 1:53 p.m. audio playing)

5 (At 1:55 p.m., audio completed)

6 Q. Tell us what happened in that clip?

7 A. Sure. So the clip started with my informant Dan, the

8 majority of the talking is done by Pete Musico and he made

9 reference to kicking off the Boog and he makes reference to

10 Adam Fox and the meeting that happened in Dublin Ohio.

11 Q. Okay. Now set up the next clip for us, what happens in this

12 clip?

13 A. It's shortly thereafter in the timeline of the training and

14 in it Pete and Joe Morrison are there with our source Dan.

15 Q. Okay. You can play exhibit twenty-one.

16 (At 1:55 p.m., audio playing)

17 (At 1:56 p.m., audio completed)

18 BY MS. DODDAMANI:

19 Q. Tell us what happened there?

20 A. So that was Pete Musico confirming that Joe Morrison knew

21 what Adam was about. Joe Morrison was the one that said

22 yeah, I'm not stupid; I know what this is about.

23 Q. So what is Adam about?

24 A. Well --

25 Q. At this point?

1 A. In Pete's words it's about pointing rifles at politicians and
2 law enforcement and pulling the trigger.

3 Q. Okay. And then after these clips, right, you can hear the
4 sound of gunfire in these clips, is that correct?

5 A. That's correct.

6 Q. All right. So then you referenced how those in -- there was
7 a discussion with leadership. Was that after or before this?

8 A. Well the -- the leadership meeting for the formalizing the
9 rank structure was June 3rd so that was before this clip.

10 Q. I'm sorry; I'm talking about playing the voice mail.

11 A. Oh.

12 Q. You said Joe Morrison played the voice mail?

13 A. Yes.

14 Q. For leadership?

15 A. Yeah, sorry. The voice mail occurred after this
16 conversation.

17 Q. Okay.

18 A. The end of training Joe played the voice mail and then they
19 reached out to Adam Fox on a conference call.

20 Q. Thank you. All right. So then my next question is did
21 Wolverine Watchman and Adam Fox's' plan for politically
22 motivated violence merge and how?

23 A. Yes. So following Dublin Ohio the Wolverine Watchman
24 attended the next national trainings and national meetings
25 and the Wolverine Watchman ended up training and talking

1 about Governor Whitmer at -- from the national stage and
2 providing operators for the kidnapping plot against Governor
3 Whitmer. And so the initial threat stream from Dublin Ohio
4 in which they were coordinating attacks across the country
5 didn't originally include the Wolverine Watchman, it did
6 include Governor Whitmer. And once the Wolverine Watchman
7 learned about it and started training for it, it became part
8 of the same plan.

9 Q. Okay. So let's talk about did Adam Fox, after this point
10 where it's clear the people know what Adam Fox is about did
11 he ever come to a training with the Wolverine Watchman?

12 A. Yes, he did.

13 Q. Okay. So let's talk about the lead up to him attending the
14 training. What's the first date that he attended training in
15 Munith Michigan?

16 A. So the first day that he attended training is June 28th.

17 Q. Okay.

18 A. 2020.

19 Q. Let's talk about from the point we were at which was June
20 14th, 2020 until that first training. How did that come
21 about?

22 A. I'll go through this --

23 Q. In relation to these three individuals seated in the
24 courtroom today.

25 A. Sure, I'll roll through this, and I'll try to be specific

1 here on where this is coming from. So this is live
2 monitoring of chats as well as monitoring of the written Wire
3 Chats. So on June 14th during a conference call with Adam
4 Fox, Pete Musico, Joe Morrison and Paul Bellar talked to Adam
5 about the direction and what they needed, and Adam said he
6 needed two hundred men to storm the Capital. They agreed to
7 meet up at a later date at a protest. So on June 18th there
8 was a Second Amendment rally at the Capital in which they met
9 up. They talked about MSP presence and how many men they
10 would need combined to take the Capital.

11 Q. And who was present then?

12 A. Pete Musico, Joe Morrison and Paul Bellar were present with
13 other members of the Wolverine Watchman leadership.

14 Q. And they met, is this the first time that these three
15 individuals meet Adam Fox in person?

16 A. That's correct.

17 Q. Okay. And what happens when they meet Adam Fox in person?

18 A. Well initially when they met each other Adam Fox patted them
19 down. The -- they introduced themselves and they realized
20 they recognized each other from the past protest.

21 Q. Okay.

22 A. Inside the Capital.

23 Q. I want you to take a look at exhibit number twenty-two, I'm
24 sorry it's in your binder; let me direct you a little better.
25 It's a twenty-two A and B I believe.

1 A. All right, I've got it here.

2 Q. Do you recognize those?

3 A. I do.

4 Q. What are they?

5 A. These are open-source photographs of Pete and Paul and Dan
6 Harris and Adam Fox at the State Capital on June 18th when
7 they met for the first time officially.

8 Q. Are they fair and accurate as to your observation?

9 A. They are.

10 Q. Okay.

11 MS. DODDAMANI: I'm going to move for their
12 admission.

13 THE COURT: Twenty-two?

14 MS. DODDAMANI: Sorry, twenty-two A and B judge,
15 thank you.

16 MR. KIRKPATRICK: No objection.

17 MR. SOMBERG: No objection

18 MR. JOHNSON: No objection, your Honor.

19 THE COURT: Admitted.

20 (At 2:01 p.m., PX 22 admitted)

21 BY MS. DODDAMANI:

22 Q. I'm going to bring up twenty-two A please. What's that?

23 A. That's a photograph of Joe Morrison raising his arm, Dan
24 Harris is in the background and Paul Bellar is on the far
25 right.

1 Q. Okay. And what is Joe Morrison wearing?

2 A. Joe Morrison is wearing a camouflage hat with the Boogaloo
3 logo and a Hawaiian shirt through the American flag. He also
4 has a Hawaiian shirt on under his kit or his ballistic armor.

5 Q. Twenty-two B please, what's this?

6 A. It's a photograph of Adam Fox on the same day, June 18th, 2020
7 wearing a Hawaiian shirt in front of the Capital.

8 Q. Okay. What happens at that -- at -- at that date at the
9 Capital? Do they meet, do they talk?

10 A. They meet and talk, they talk about what type of MSP
11 resources they have and how they can potentially storm the
12 Capital in the future. They agree to have another meeting in
13 Grand Rapids.

14 Q. Okay and when is that?

15 A. The meeting in Grand Rapids ended up being on June 20th, 2020.

16 Q. Okay. And what was that about and who went?

17 A. Paul Bellar, Ty Garbin and Dan went representing the
18 Wolverine Watchman.

19 Q. Okay. What happens at that meeting and what -- what is --
20 what is in Grand Rapids?

21 A. Well Grand Rapids, they met at the Back Shack, which is.

22 Q. What's the Back Shack?

23 A. The Back Shack is a vacuum business where Adam Fox works and
24 lives in the basement.

25 Q. Okay. Tell me about that?

1 A. It's a vacuum repair business and then in the basement
2 there's a trap door under a rug leading to an open area under
3 numerous other facilities, kind of like a strip mall. And
4 then the basement runs under all the businesses and Adam Fox
5 has access through the trap door to the basement.

6 Q. Okay. Now you said Paul Bellar went to this meeting, is that
7 right?

8 A. That's correct.

9 Q. And was, were Joe Morrison and Pete Musico were at the
10 meeting?

11 A. They were.

12 Q. Okay. And you said Paul Bellar represented the Wolverine
13 Watchman, is that right?

14 A. That's correct.

15 Q. What happens in this meeting?

16 A. Well at the meeting they talked to Adam Fox and he gives them
17 further details about the Dublin meeting, gives them further
18 details about different attack plans.

19 Q. Like what?

20 A. Well he talks about storming the Capital and Paul Bellar and
21 Ty Garbin suggested anticipating a law enforcement response
22 and having snipers to take out police when they respond to
23 try to protect the Capital.

24 Q. The storming that was discussed in the meeting?

25 A. No, they specifically discussed how many operators they had

1 on their side. The Wolverine Watchman talked about the
2 numbers they had; Adam Fox talked about the numbers he had.
3 They talked about potential explosives experts they could
4 use, and Ty Garbin talked using his federal firearms license
5 to try and get technical or truck mounted automatic weapons
6 to help with the fight.

7 Q. Did Paul Bellar contribute to these plans or these
8 discussions in any way?

9 A. Yes.

10 Q. How?

11 A. Well Paul was engaged in the conversation with Adam Fox
12 talking about the training techniques the Wolverine Watchman
13 had and what they could bring to the table.

14 Q. Is this an effort to combine forces and ideas?

15 A. Absolutely.

16 Q. Okay. So what happens after this meeting?

17 A. Well after this meeting Ty Garbin and Paul Bellar tell Dan
18 through the leadership chat that they provided Joe Morrison
19 and update of the meeting.

20 Q. Okay. And then what happens after that?

21 A. After that on June 26th, 2020 Joe Morrison and his wife Jayda
22 have dinner with Adam Fox and his girlfriend Amanda Keller.

23 Q. Okay. And what happens then?

24 A. Following that they agreed to invite, Joe and Jayda agreed to
25 invite Adam to Munith to attend their next tactical training.

1 Q. Did they consult with other members and seated in the
2 courtroom today or other members of leadership with the
3 Wolverine Watchman?

4 A. Well they talked about it generally; there was a lot of
5 discussion. They didn't necessarily ask permission, they
6 just said they met with them and they were going to allow it
7 to happen.

8 Q. Is there any hesitancy in -- in inviting Adam Fox to come
9 train with them?

10 A. Yeah, so there was a lot of hesitancy. Joe Morrison in
11 particular, Pete Musico also exhibited a lot of paranoia
12 because trust in Adam Fox and what he would bring to the
13 table.

14 Q. What do you mean by that, do you mean that they weren't
15 interested in this plans for politically motivated violence
16 or was it something else?

17 A. They were definitely interested in his plans for politically
18 motivated violence. Pete Musico thought Adam might be a
19 loose cannon, and Joe was worried about his operational
20 security, and how he might bring law enforcements attention
21 to them.

22 Q. Law enforcement attention to whom?

23 A. The Wolverine Watchman.

24 Q. Okay. So were their concerns about Adam Fox about his plans
25 or were they about the -- the logistics and who he was and

1 whether they could trust him?

2 A. Yeah, they were just concerned about his leadership
3 abilities, communication abilities, basically logistical
4 concerns when you're combining multiple militias together.

5 Q. Okay. So do the three individuals in the courtroom agree, I
6 guess I should ask you does the Wolverine Watchman's
7 leadership agree that Adam Fox ultimately comes to the
8 training?

9 A. Yeah. So the entire leadership crew agrees that Adam can
10 come to the training and they talk about different
11 operational security tactics and how they're going to treat
12 him when he comes.

13 Q. And who is it that actually suggests inviting Adam Fox to the
14 training in Munith?

15 A. It's Joe Morrison.

16 Q. Joe Morrison's idea? Does Pete Musico ever talk with the
17 source, in anything recorded that you've heard about whether
18 Adam Fox should be attending any of these training?

19 A. Yes, Pete Musico had a recorded phone call with the source on
20 June 22nd in which he said Adam was a value to asset and they
21 should bring him in.

22 Q. Okay. When is the first time that Adam Fox does train with
23 the Wolverine Watchman?

24 A. That's on June 28th, 2020 in Munith Michigan.

25 Q. Okay. Now June 28th, at this point what do these three

1 individuals know according to your observations and all of
2 your monitoring about Fox's plans for politically motivated
3 violence?

4 A. Well they know Fox was focused on attacking the Capital and
5 they knew that they believed as a group that Fox's attacks
6 were a martyrdom operation. And they believed they could
7 achieve attacks without having the operators being hurt. In
8 other words, they could live to fight another day following
9 the attacks. So they were at odds with his idea of doing so
10 public and not being able to get away.

11 Q. Did they know about his recruiting efforts for his plans for
12 violence?

13 A. Yes, he told them.

14 Q. Did they, all three of these individuals, did they have the
15 same target at this point?

16 A. They were all focused on the Capital at that point. They
17 just, there was discussion of other targets, Pete brought up
18 attacking other politicians or trying to go directly to the
19 homes of politicians and the homes of law enforcement. Pete
20 was more concerned; he called the Capital a fishbowl and he
21 thought they'd be more effective if they could do different
22 snatch and grab operations or different operations at 3 a.m.
23 where they're going to politicians and law enforcements
24 officers' houses.

25 Q. What does that mean; he thought that the Capital was a

1 fishbowl?

2 A. Well tactically speaking as they just, as they -- as Pete
3 discussed it, he thought that everybody was looking in. In
4 other words, everybody would be able to see them; they
5 wouldn't be in a position of tactical advantage.

6 Q. Okay. And as far as your monitoring and your observations at
7 this point in time, at the time Adam Fox is at this training
8 on June 28th are these three individuals in agreement with his
9 plans and how do you know that?

10 A. They're in -- they're in agreement with the concept of
11 political violence, but not with his attack strategy. So
12 they said the problems they have with his attack strategy and
13 they talked about it.

14 Q. Were they in agreement with killing law enforcement and
15 politicians?

16 A. Yes.

17 Q. Do they agree on how to do it?

18 A. No.

19 MS. DODDAMANI: Just a moment Judge.

20 THE COURT: Okay.

21 BY MS. DODDAMANI:

22 Q. So what do the Wolverine Watchman as a group do to contribute
23 to these plans that Adam Fox has?

24 A. Well first off Joe told Adam Fox that he needed to have a
25 better operational security and they told him about how they

1 communicated with the Wire app which Adam Fox then started
2 using to communicate to avoid detection from law enforcement.
3 Second off they told him about their concepts of being able
4 to reach out and touch politicians without putting their
5 operators at risk and they introduced him to some of the --
6 the squad tactics and team movements.

7 MR. KIRKPATRICK: Your Honor, I guess I would ask
8 him for more clarification on who they is, is all three of
9 them at the same conversation, was it one, was it another.

10 THE COURT: I think you need to be, lay a little bit
11 more foundation.

12 MS. DODDAMANI: Sure, judge.

13 THE COURT: Or at least have him use names and not
14 pronouns.

15 MS. DODDAMANI: So my question judge was this is
16 regarding the gang charges is as a group the Wolverine
17 Watchman, how did the group contribute because what I have to
18 show in order to prove the elements is that the group or the
19 gang provided the motive, the means or opportunity to commit
20 the felony. And so I am kind of generally getting this right
21 now, but I will go into the specifics of the June 28th
22 training, things like that. Is that -- is that all right
23 with your Honor?

24 THE COURT: I -- I would -- I know what you have to
25 prove in terms, I have the statute here. But you can show

1 they by being specific as to who constitutes they.

2 MS. DODDAMANI: Okay. Thank you, your Honor.

3 BY MS. DODDAMANI:

4 Q. Could you clarify Agent Impola?

5 A. Sure, I'll try to be more specific. I guess can you ask the
6 question again?

7 Q. Sure. What did the Wolverine Watchman and these three
8 individuals do to contribute to the plan that Adam Fox had
9 conveyed?

10 A. Sure.

11 Q. And you talked about operational security and you talked
12 about, I'm sorry I forgot the last thing you talked about.

13 A. Sure. So Pete Musico, Joe Morrison and Paul Bellar as
14 leaders of the Wolverine Watchman told Adam Fox that he
15 needed more operational security. They showed him how to be
16 operational, operational in security. And when I say they
17 Joe Morrison specifically told Adam Fox that he needs to not
18 post his home address on the training. That he needed to
19 have more OPSEC.

20 Q. What is OPSEC?

21 A. OPSEC is short for operational security.

22 Q. Okay.

23 A. And then Pete Musico told Adam Fox that his tactics were
24 unlikely to succeed. That they were a fishbowl and that it
25 could be done better and offered alternative plans for

1 attacking politicians and law enforcement.

2 Q. Okay. Did they provide any tactical expertise?

3 A. Yes. So Pete Musico provided his tactical advice and

4 expertise based on his surveillance of the Capital during the

5 previous protest. Joe Morrison also did the same thing with

6 Adam Fox, and then Paul Bellar provided his advice as to

7 working as a team, setting up a -- a training itinerary and

8 making sure everybody was down with the basics.

9 Q. Okay. Ultimately, they made that decision to invite him to

10 training, tell me about the June 28th training in Munith

11 Michigan?

12 A. Sure.

13 Q. Did Fox, did Adam Fox attend the training?

14 A. Yes.

15 Q. I think we went there, already right?

16 A. Adam Fox did attend, attend the training.

17 Q. who came with him?

18 A. He brought his XO and his girlfriend.

19 Q. What's an XO?

20 A. Executive Officer.

21 Q. Okay. And what's his name?

22 A. It was Shawn Fix.

23 Q. Okay, go ahead.

24 A. So Adam Fox and Shawn Fix following the training were invited

25 into Joe Morrison's house and Adam Fox made a show of having

1 Shawn Fix being read an oath to the Michigan Three
2 Percenters.

3 Q. What's the Michigan Three Percenters, Michigan Patriot Three
4 Percenters?

5 A. Yeah, the Michigan Patriot Three Percenters are Adam Fox's
6 Facebook group, which were created in order to organize the
7 second Continental Army that he was in charge of in Michigan.

8 Q. Sorry, go ahead. And -- and Fox's role in the Michigan
9 Patriot Three Percenters was what?

10 A. He's the commanding officer.

11 Q. Thank you. Did training occur on this date?

12 A. It occurred.

13 Q. Tell me about it?

14 A. They had live fire training, they had weapons manipulation,
15 reloading.

16 Q. What's weapons manipulation?

17 A. That's basically moving with your weapons and putting the
18 safety on and off, changing magazines, transferring from your
19 primary weapons system to your secondary weapon system. It
20 was a standard training; I don't have the itinerary.

21 Q. Okay. And was this concept of catch and release brought up
22 at this training?

23 A. Yes, it was. Pete Musico brought when challenging Adam Fox
24 and stated why don't we catch and release politicians?

25 Q. What does that mean?

1 A. Generally speaking it meant kidnapping politicians and then
2 later letting them go when a statement had been made.

3 MS. DODDAMANI: Your Honor, would this be an okay
4 time to just take a five-minute break.

5 THE COURT: As I indicated if anyone needs to take a
6 break that's fine, so is five minutes enough or do you guys
7 want to take a little bit more?

8 MS. DODDAMANI: Ten judge, if that's all right?

9 THE COURT: I'll -- I'll tell you what, I'll do you
10 a -- we'll take about a thirteen-minute break.

11 MS. DODDAMANI: Okay, thank you judge.

12 THE COURT: And we'll come back at two-thirty.

13 MR. SOMBERG: Thank you, judge.

14 THE COURT: Thanks.

15 (At 2:16 p.m., recess)

16 (At 2:29 p.m., back on the record)

17 THE COURT: Okay. We're back on the record and
18 we're continuing with direct examination, go ahead.

19 MS. DODDAMANI: Thank you. Thank you, your Honor.

20 CONTINUING DIRECT EXAMINATION

21 BY MS. DODDAMANI:

22 Q. Okay. We talked about the June 28th, 2020 training, is that
23 correct?

24 A. That's correct.

25 Q. Okay. Were, after this training were any security meetings

1 held after this?

2 A. Yes. Paul Bellar hosted a security meeting on July 7th of

3 2020.

4 Q. Where?

5 A. At his residence.

6 Q. Okay. Was this recorded, was it like monitored, those sorts

7 of things?

8 A. Yes, it was recorded and live monitored.

9 Q. Okay. Tell me about any significant events that occur at

10 this meeting?

11 A. Well at this meeting Paul Bellar introduced the concept of

12 changing tactics so he talked about having the QRF operate as

13 a ghost group and to change their communication strategy and

14 to come up with code words in case law enforcement was

15 getting involved.

16 Q. When you say ghost group what does that mean?

17 A. Well he basically talked about being silent, not being

18 visible at protests and operating and training in the shadows

19 until it was time to strike.

20 Q. Okay. And ghost, meaning sort of low profile as opposed to

21 what?

22 A. As opposed to being publicly visible wearing Hawaiian shirts

23 at a protest.

24 Q. Like the Wolverine Watchman?

25 A. That's correct.

1 Q. As led by Joe Morrison, correct?

2 A. That's correct.

3 Q. Okay. So tell me about this communication, and the secrecy
4 around this?

5 A. Well Paul Bellar invited the QRF group to the meeting at his
6 house and he introduced specific code words that the group
7 could use when they're discussing illegal weapons, when
8 they're discussing future training and the concept was that
9 only the people who knew the code words and knew what they
10 meant would really understand what's going on. And that law
11 enforcement even if they did intercept the communications
12 would be oblivious to what was being talked about.

13 Q. And what about, was operational security employed at this
14 meeting?

15 A. Yes. So at the meeting Paul Bellar collected all the cell
16 phones in a metal ammo can so that they could discuss what
17 was going on without anything being recorded.

18 Q. And who among the attendees in this meeting ended up being
19 federally charged defendants who were involved in the
20 kidnapping plot?

21 A. Yes. So Ty Garbin, Kaleb Franks, Dan Harris, those were the
22 -- the three that were there.

23 Q. Okay. I want you to look in the exhibit binder please,
24 exhibits twenty-three A and B.

25 A. I see them.

1 Q. Can you tell us what those are?

2 A. Yes. Twenty-three A is a typed-out document which, it, it's
3 a photograph of a typed-out document with a number of code
4 words on it.

5 Q. And what -- what -- is this -- is this a document based on
6 the meeting that you listened to from 7-7?

7 A. Yes. So these are the code words that Paul Bellar proposed
8 at the 7-7- meeting which the group discussed and agreed upon
9 and then later on July 26th Paul Bellar passed out the typed-
10 out code words to other members who didn't attend the
11 training.

12 Q. Okay. And is it fair and accurate?

13 A. It is.

14 Q. All right. How about twenty-three B?

15 A. Twenty-three B is a photograph of a notebook from Paul
16 Bellar's apartment on, I took the photograph on August 6th and
17 it's a handwritten description of code words which are the
18 same code words which were discussed during the July 7th, 2020
19 meeting at Paul's house.

20 Q. Okay. So when was this recovered, twenty-three B?

21 A. Twenty-three B was recovered on August 6th, 2020.

22 Q. Okay. I will get to that in a moment okay. I'm going to,
23 and is this fair and accurate?

24 A. It is.

25 Q. Okay.

1 MS. DODDAMANI: I'm going to move for its admission.
2 THE COURT: Mr. Kirkpatrick?
3 MR. KIRKPATRICK: No objection, your Honor.
4 THE COURT: Mr. Somber?
5 MR. SOMBERG: No objection, your Honor.
6 THE COURT: And Mr. Johnson?
7 MR. JOHNSON: No objection, your Honor.
8 THE COURT: Okay. Twenty-three A and B will be
9 admitted.
10 MS. DODDAMANI: Thank you.
11 (At 2:33 p.m., PX 23 admitted)
12 BY MS. DODDAMANI:
13 Q. Could you put up twenty-three A? Are these, tell me what's
14 significant about this?
15 A. These are the code words the Wolverine Watchman agreed on
16 during the meeting. I'll read them verbatim for the Court.
17 It says destroy after memorizing. Training means bon fire.
18 There's an example hey Jim when's the bon fire. Kit, ammo,
19 weapons are referred to as s'mores, should we bring s'mores.
20 NFA items, which means National Firearms Act, those are
21 federally regulated firearms are called spaghetti-o's. Hey,
22 I need to get some spaghetti-o's. Full auto, which is a
23 fully automatic machine gun, it's an illegal rifle if you
24 don't, if it's not registered, it is referred to as a can
25 opener. Hey, can I get a can opener. Tail, fed, cop is

1 ticks, hey my dogs got ticks, that's a reference to
2 statements they wanted to put out to the group if the
3 Wolverine Watchman were compromised and somebody was
4 following them.

5 Q. They, what do you mean by they?

6 A. The attendees at the August 7th meeting.

7 Q. August 7th meeting or July 7th?

8 A. Excuse me July 7th meeting.

9 Q. Okay.

10 A. So specifically Paul Bellar was at that meeting, Joe and Pete
11 were not at the meeting.

12 Q. Okay.

13 A. QRF is going to be referred to as skidoo, want to help me
14 work on my ski-doo and then unwanted eye and ears are going
15 to be references to in-laws, hey the in-laws are in town
16 today. That means have some more operational security. At
17 the bottom, it says OPSEC is a must, call signs are a
18 requirement, please abide by this, keep our team and yourself
19 safe.

20 Q. Okay. Could you put up twenty-three B please, what's this?

21 A. This is handwritten notes in a notebook that I found in Paul
22 Bellar's apartment after he moved out.

23 Q. Okay. So let's talk about that for a minute. You said that
24 Paul Bellar moved on a -- out of his apartment, when was
25 that?

1 A. Towards the end of July.

2 Q. Okay. So the last thing we talked about was July 7th so now I
3 want to skip ahead a little bit to Paul Bellar's apartment.
4 What happened in Paul Bellar's apartment?

5 A. Well after he moved out, he abandoned a lot of his things and
6 the management at the apartment ended up being in contact
7 with local law enforcement, and I contacted Milford P.D.
8 and requested to look at some of his abandoned items that he
9 left behind.

10 Q. And did you do that?

11 A. I did.

12 Q. Did you find anything relative to this investigation?

13 A. I did.

14 Q. What did you find?

15 A. Well I found this notebook here with handwritten notes as
16 well as general items left behind in Paul Bellar's room.

17 Q. Okay. Can you take a look at, in your exhibit binder exhibit
18 twenty-six A, B and C and for the attorneys I might, I might
19 have labeled this twenty-seven in the folder of twenty-seven?
20 So if there's a -- an issue here look under your twenty-
21 seven. Do you recognize twenty-six A, B and C?

22 A. I do.

23 Q. Okay. And what are those?

24 A. Those are, these are notes and photographs that I took inside
25 Paul Bellar's apartment.

1 Q. Of relevant items?

2 A. That's correct.

3 Q. Okay. Are they fair and accurate?

4 A. They are.

5 Q. Okay.

6 MS. DODDAMANI: I'm going to move for their
7 admission.

8 THE COURT: Mr. Kirkpatrick?

9 MR. KIRKPATRICK: For purposes of exam, I have no
10 objection.

11 THE COURT: Okay. Mr. Somberg?

12 MR. SOMBERG: No objection, your Honor.

13 THE COURT: And

14 MR. JOHNSON: No objection, your Honor.

15 THE COURT: Okay. For purposes of preliminary
16 examination, only I'll admit it.

17 MS. DODDAMANI: Thank you.

18 (At 2:37 p.m., PX 26 admitted)

19 BY MS. DODDAMANI:

20 Q. Twenty-six A please, can you tell me what that is?

21 A. Sure. These are handwritten notes, and it says, I'll just
22 read the notes. It says new ranks, members, sergeants,
23 lieutenants, captains, then under that there's a line it says
24 medical, march, maneuver, A, B pillars, driver down and
25 dismount vehicle, storage, down convoy. And then under that

1 it says ambushes, planned opportunity.

2 Q. Okay. And what did you, why -- why was this relevant to you?

3 A. These are training maneuvers the Wolverine Watchman practice
4 that Paul Bellar taught to the group including Adam Fox. So
5 to me this is independent evidence corroborating the
6 recordings and his actions.

7 Q. Okay. Twenty-six B. what's this?

8 A. This is a printout of a typed-out training itinerary.

9 Q. Okay. And a what -- what types of tactics are listed here in
10 the basic training?

11 A. I'll read the whole thing for the Court. It says basic
12 training, basic first aid, advanced emergency medical aid,
13 weapon basics, cleaning, field stripping, proper handling and
14 set up, marksmanship, excuse me marksmanship, how to engage
15 at multiple targets at various distances, hand-to-hand/knife
16 basics, battle drills, foot patrol, battle drills breeching
17 and clearing, road convoy drills, receiving contact while in
18 vehicle-how to respond, moving and communicating, sit reps,
19 proper foot patrol distance responses, etc., navigation,
20 compass and shit, followed by YEET TEAM 13.

21 Q. Okay. What is the YEET TEAM again, what does that mean?

22 A. The best I can describe it is --

23 MR. KIRKPATRICK: Objection speculation.

24 MR. JOHNSON: Objection speculation.

25 MS. DODDAMANI: That's fine judge.

1 THE COURT: Okay.

2 MS. DODDAMANI: I'll just strike the question.

3 THE COURT: Okay. Sustained.

4 BY MS. DODDAMANI:

5 Q. All right. Twenty-six C?

6 A. That's a photograph I took of Boogaloo Avenue, which is a
7 handwritten, on a piece of wood posted in Paul Bellar's room.

8 Q. Okay, thank you, you can take that down.

9 THE COURT: For purposes of the record if, if my
10 notebook becomes the court file.

11 MS. DODDAMANI: Yes.

12 THE COURT: Twenty-six A, B and C as you eluded to
13 previously actually show up in my book as twenty-seven A, B
14 and C.

15 MS. DODDAMANI: Thank you judge, I'll remark that at
16 a break if you don't mind?

17 THE COURT: Okay. Okay.

18 MS. DODDAMANI: Thank you.

19 BY MS. DODDAMANI:

20 Q. Okay. So now we went, we kind of for, fast-forwarded it to
21 when you recovered these items from Paul Bellar's apartment
22 right, in August? So let's go back and go back to the time
23 period we were at which was, we were just after July 7th,
24 2020. What's the next significant event that takes place
25 with the Wolverine Watchman or the three people seated in the

1 courtroom today?

2 A. Sure. So the next significant event is the national militia
3 training in Cambria Wisconsin.

4 Q. What's that?

5 A. So that's a training organized and put on by Barry Croft and
6 the Wisconsin Patriot Three Percenters who were all
7 represented at the Dublin meeting in which they coordinated
8 attack plans. So this was the next phase of the national
9 attack planning in which operators were invited to network
10 and help come up with attack across the country.

11 Q. Okay. So was this recorded?

12 A. It was.

13 Q. Were you live monitoring?

14 A. I was.

15 Q. Okay. So what -- what -- this, we talked about what this
16 training was for, kind of who hosted it?

17 A. It was hosted at a Wisconsin Patriot Three Percenters private
18 residence in Cambria Wisconsin.

19 Q. Okay. Let's talk about who attended? Who of the Wolverine,
20 who in the courtroom that's seated here today attended that
21 training?

22 A. Only Paul Bellar did.

23 Q. Okay.

24 A. Joe Morrison and Pete Musico did not attend the training.

25 Q. Okay. What about were there Wolverine Watchman members that

1 are currently charged in Federal Court that attended this
2 training?

3 A. There were.

4 Q. Okay. Were there Wolverine Watchman members that were, are
5 charged in State Court that are not part of this proceeding,
6 did any of them attend?

7 A. They did.

8 Q. Who is that?

9 A. Bill Null and Michael Null, sorry I'm thinking through all
10 these defendants in all the cases and Shawn Fix attended.

11 Q. Thank you. Did people who were part of as you discussed
12 before sort of the overall, others known to the investigation
13 anyone from there attend this training?

14 A. Yeah, so Barry Croft the leader of the national movement and
15 Adam Fox is commander in Michigan attended.

16 Q. Okay. Were Mr. Morrison or Mr. Musico invited to attend this
17 training?

18 A. They were invited, yes.

19 Q. And did they have knowledge that this training was occurring
20 based on your monitoring and observation?

21 A. Yes. Based on monitoring the Wire Chats they knew the
22 training was happening and they decided not to go.

23 Q. Okay. But Paul Bellar did in fact attend, correct?

24 A. That's correct.

25 Q. Okay. The people that went, did they spend their own money

1 to attend this training?

2 A. Yes, they coordinated their work schedules, they packed and
3 gathered supplies, about six thousand rounds of ammunition
4 amongst all the group members and they -- they used their own
5 money for lodging and room and board.

6 Q. Okay. Did they stay in hotels?

7 A. They did.

8 Q. Spent their money on that, is that correct?

9 A. That's correct.

10 Q. And they coordinated driving, correct?

11 A. That's correct.

12 Q. Okay. Was there any security planned for this training that
13 Paul Bellar was part of?

14 A. Yes. So Paul Bellar came up with a security plan. He came
15 up with an -- an XFIL point.

16 Q. What's an XFIL point?

17 A. It's exfiltration so it's a military term to get out of a hot
18 zone or a hot area where you're under fire. So he looked on
19 google maps at the location of the training and found a local
20 manufacturing plant nearby and this occurred at the July 7th,
21 2020 meeting at Paul's house.

22 Q. Why would they need an XFIL point or what you just said?

23 A. Well they were worried about being set up and law enforcement
24 coming so Paul told the group that if law enforcement hit the
25 place they were going to dig in and shoot it out.

1 Q. Did Paul Bellar's attending of the training in Wisconsin, was
2 his membership in the Wolverine Watchman, did that provide
3 him the means and opportunity to attend that training?

4 A. That's correct, he was -- he was representing the Wolverine
5 Watchman when he attended the training.

6 Q. And at this point and everything, you've testified to are
7 attack plans on the table?

8 A. Yes, absolutely.

9 Q. What was Bellar's role in the training?

10 A. Well originally Bellar attended the first iteration of
11 training as an operator with the Wolverine Watchman; they
12 stayed together as a group and moved through some of the
13 shooting drills and the kill house together.

14 Q. So were firearms used at this training?

15 A. There were.

16 Q. And in possession, were in possession of firearms while
17 training, is that correct?

18 A. That's correct, Paul Bellar was in possession.

19 MR. JOHNSON: Your Honor I object this is in
20 Wisconsin, the Court has no jurisdiction on what happened in
21 Wisconsin. So I understand it's part of the picture but
22 getting into details whether or not firearms were used in
23 Wisconsin don't matter.

24 MS. DODDAMANI: They certainly matter for the entire
25 situation judge. What they're doing in Wisconsin is still

1 acts, that this is an ongoing conspiracy.

2 MR. JOHNSON: Your Honor this Court cannot bind
3 defendants over for anything that occurred in Wisconsin.

4 MS. DODDAMANI: That's not the case, this is all one
5 continuing conspiracy and so any venue you hit, acts are
6 relevant to the larger charges judge.

7 THE COURT: I'll overrule the objection, go ahead.

8 BY MS. DODDAMANI:

9 Q. Tell me about what, okay. Tell me what happened at this
10 training? Tell me about if they're tactics were practice?

11 A. Sure. So at the training there was medical training and
12 there was a kill house set up as they described it.

13 Q. What is a kill house?

14 A. A kill house is an area staged to resemble a building
15 including doors and hallways and rooms so that you can move
16 through it tactically like you would a building.

17 Q. Is it an actual building?

18 A. No it's a training ground set up to be a building where you
19 can practice live fire without actually shooting up a
20 building.

21 Q. So if it's not a building what is it made out of?

22 A. Well this particular one was made out of plywood and two by
23 fours and a doorframe hung up. It's basically rough
24 carpentry kind of just assembled to mimic a building.

25 Q. What's the purpose of having a kill house or shoot house?

1 A. So you can practice breaching and entering a building and
2 then live fire decisions made in the building and team
3 movement through the building, through danger areas and as
4 you make contact with your enemy.

5 Q. Okay. So you talk about this short house, kill house, we
6 were talking about training and the types of tactics that
7 were practiced, what additional types of tactics or trainings
8 was happening?

9 A. Well additionally there was medical training and then during
10 the training they also worked with improvised explosives and
11 they set off a couple IED's that they could use.

12 MR. KIRKPATRICK: Again I want clarity on this
13 because they, is a lot of people and --

14 MS. DODDAMANI: I get it; I can ask a clarifying
15 questioning.

16 THE COURT: I will sustain that objection.

17 MS. DODDAMANI: Sure.

18 BY MS. DODDAMANI:

19 Q. Can you tell me who they is and tell me about, you -- you
20 talked about an IED right?

21 A. Sure.

22 Q. What's an IED?

23 A. So an IED is an improvised explosive device.

24 Q. Okay. So what happened with an IED and be more specific if
25 you could?

1 A. Sure. So Barry Croft brought components of an IED, and he
2 had Ty Garbin and Dan Harris assemble an IED in front of the
3 Wolverine Watchman during the training. Then --

4 Q. Was Paul Bellar present?

5 A. Paul Bellar was present.

6 Q. Okay.

7 A. Then they tried to set off the IED, when I say they I mean
8 Paul, Ty, Barry Croft. There was also about thirty members
9 of the Wisconsin Patriots Three Percenters and other militias
10 around the US.

11 Q. When you say Paul tried to set off an IED what do you mean?

12 A. I'm sorry, let me clarify that. So Paul was present when
13 Barry and Dan and Ty tried to set off the IED.

14 Q. Okay. Thank you. So you talked about this IED, what other
15 tactics were being trained there?

16 A. They were training with tactical reloads and bound, leaping
17 and bounding techniques.

18 Q. What does that mean?

19 A. So that means getting in a position of cover and concealment
20 and moving as a team as you engage the enemy. So you'd
21 engage the enemy and allow, take fire or occupy their time
22 while your teammates can move to a new location and then do
23 the same while you move. So it's a military tactic to safely
24 move through open areas or rural, rural environments.

25 Q. What's tactical reload?

1 A. So tactical reload would be shooting rounds from your rifle
2 or handgun and consuming ammunition and then when you get to
3 a position of coverall, cover or concealment you would take
4 out a new magazine that's full and put it in and take your
5 half-filled magazine or your partially emptied magazine and
6 put it away so that when you re-engage the enemy you've got a
7 full magazine, you've got all your ammo ready and you're not
8 going to run dry during the middle of a fire fight.

9 Q. Okay. Are these all-offensive tactics?

10 A. Well a lot of the weapons manipulations and can -- can be
11 good tactics for anything, but certainly breeching and
12 leaping and bounding and moving -- moving as a team, those
13 are offensive.

14 Q. Did Paul Bellar engage in practicing these tactics?

15 A. He did.

16 Q. Did he engage in any instruction, in any of the training that
17 was happening at this -- at this training?

18 A. Yes. So the second day of Wisconsin, so this was July 12th he
19 started teaching and providing medical advice during the
20 medical portion of the training.

21 Q. Okay. And when you say teaching to who?

22 A. Teaching to every member of the training who went through his
23 station. So it was station-based training so during the
24 medical station, a group of operators would come through and
25 Paul would teach them. They'd move on to other stations at

1 the tactical training, the kill house being a station, moving
2 under fire being another station.

3 Q. The medical training that you're talking about that he
4 provided was that similar to things you testified to prior
5 which is you know bandaging up someone with gun, gunshot
6 wounds and -- and things like that, what was it?

7 A. Yes. So it's consistent with his expertise, which is
8 basically plugging holes and keeping people alive during a
9 firefight until you can get to a higher standard of care.

10 Q. Okay. Was he engaged in these, was he engaged in these
11 training exercises with other members of the Wolverine
12 Watchman?

13 A. Yes.

14 Q. Did that group of the Wolverine Watchman that attended, did
15 they gain any praise for their abilities?

16 A. Yes. So Barry Croft and Adam Fox both specifically called
17 out the Wolverine Watchman for their efficiency as a team
18 moving through the kill house. How they were able to
19 communicate and their weapons handling techniques. He
20 praised them in front of others as an ideal team that he's
21 looking for -- for in operators.

22 Q. Okay. I'm going to ask you to look in your binder at
23 exhibits twenty-four A through D.

24 A. All right.

25 Q. Take a look at those, do you recognize those?

1 A. I do.

2 Q. Okay. And what are they, start with twenty-four A and B?

3 A. So twenty-four A and B are photographs of the Wolverine

4 Watchman, specifically Ty Garbin, Paul Bellar, Kaleb Franks

5 and Dan Harris entering and then moving through a kill house.

6 Q. Okay. And what's twenty-four C and D?

7 A. Twenty-four C and D are videos of the Wolverine Watchman, the

8 same members I just listed moving through a kill house.

9 Q. Are they fair and accurate?

10 A. They are.

11 Q. Okay.

12 MS. DODDAMANI: Okay. I'm going to move for the

13 admission of all four?

14 THE COURT: Mr. Kirkpatrick:

15 MR. KIRKPATRICK: No objection.

16 THE COURT: Mr. Somberg?

17 Mr. somber: No objection.

18 THE COURT: Mr. Johnson?

19 MR. JOHNSON: No objection, your Honor.

20 THE COURT: Okay. Twenty-four A through D will be

21 admitted.

22 (At 2:52 p.m., PX 24 admitted)

23 MS. DODDAMANI: Thank you. Your Honor there's a, on

24 twenty-four D I'm asking; when we get there that the camera

25 be turned off of the live stream.

1 THE COURT: Okay. Once again confidential
2 information?

3 MS. DODDAMANI: Yes, judge.

4 THE COURT: Mr. Kirkpatrick?

5 MR. KIRKPATRICK: I have no objection.

6 THE COURT: Mr. Somberg?

7 MR. SOMBERG: No objection, your Honor.

8 THE COURT: Mr. Johnson?

9 MR. JOHNSON: No objection, your Honor.

10 THE COURT: Okay.

11 MS. DODDAMANI: Thank you.

12 BY MS. DODDAMANI:

13 Q. Twenty-four A please, tell me about this?

14 A. So this is the Wolverine Watchman stacking up on a door in
15 front of the kill house in Cambria Wisconsin on July 11th,
16 2020. The guy on the left was the suppressor and his weapon
17 index up is Kaleb Franks. Dan Harris is in the middle of the
18 doorway, Ty Garbin is the third from the left and Paul Bellar
19 is on the far right with his hand on Ty Garbin's shoulder.

20 Q. Thank you. Twenty-four B please?

21 A. This is a still photograph of entry into the kill house so on
22 the far right is Ty Garbin, in the middle is Paul Bellar, the
23 third from the right is Kaleb Franks, and the far left is Dan
24 Harris.

25 Q. Thank you. Twenty-four C please and this is a video, so I

1 want to make sure that the -- just give us one second.

2 (At 2:54 p.m., video exhibit played)

3 BY MS. DODDAMANI:

4 Q. And twenty-four D, but I'm going to ask before we play it
5 that the camera from the live stream is turned off.

6 THE COURT: Based on a stipulation parties due to
7 the confidential information we'll have Ms. Cavanaugh shut
8 the live stream.

9 MS. DODDAMANI: Thank you, go ahead.

10 THE COURT: Are we off now?

11 (At 2:55 p.m., video exhibit played)

12 BY MS. DODDAMANI:

13 Q. Okay. Can you describe for us what happened in that video?

14 A. Yeah, so in that video Paul Bellar led the team breeching the
15 door as they cleared a room.

16 Q. Thank you. I think the camera can be turned back on judge,
17 thank you.

18 THE COURT: Okay.

19 BY MS. DODDAMANI:

20 Q. Okay. So let's talk about during this training in Wisconsin
21 was attack planning discussed and was Paul Bellar any part of
22 that?

23 A. So attack planning was discussed and yes and Paul Bellar was
24 present, he didn't contribute significantly to any particular
25 expertise in the plan.

1 Q. Where was something discussed and by whom?

2 A. Well during the training during the day on July 11th Barry
3 Croft discussed kidnapping Governor Whitmer and how he'd be
4 bringing a team of operators to Michigan to kidnap Governor
5 Whitmer.

6 Q. Okay. Was there a dinner that was later after the field
7 training exercise?

8 A. There was.

9 Q. Tell me about that?

10 A. So at the dinner a number of the operators, so Barry Croft,
11 Adam Fox, all of the Wolverine Watchman including Paul Bellar
12 were present at the dinner.

13 Q. Okay. Wand what was discussed?

14 A. Generally speaking they discussed attacking Michigan State
15 Police, they discussed kicking off the Boog and going to
16 Michigan and they discussed a -- a 501C3 charity and illegal
17 weapons they could use for their attack plans.

18 Q. Okay. After the training was concluded, was there a car ride
19 home that Mr. Bellar was part of?

20 A. There was.

21 Q. Is there any significant statements that occurred during that
22 car ride?

23 A. The group just discussed how the training went and what they
24 thought and then they agreed to invite everybody to Michigan
25 for the next training evolution nationally, which would be in

1 Luther.

2 Q. Okay. What's the next significant event that happens after
3 this? So we were just in July 11th and 12th, what's the next
4 significant event that occurs?

5 A. So the next significant event is national militia meeting in
6 Peebles Ohio on July 18th.

7 Q. Okay. Tell me about what was happening in Peebles Ohio on
8 July 18th and was it recorded or monitored or any of that
9 stuff?

10 A. Yes. So the national meeting in Peebles was attended by Dan
11 and he was transmitting and recording the meeting and it was
12 attended by the Wolverine Watchman.

13 Q. What about the three individuals in this courtroom?

14 A. None of the three individuals in this courtroom were present
15 at the Peebles Ohio meeting.

16 Q. Okay. So and I'm going to get to what happens in relation to
17 these three individuals during that meeting, but who arranges
18 this meeting?

19 A. Barry Croft.

20 Q. Okay.

21 MR. JOHNSON: Your Honor, I would object as to
22 relevance. If there not there.

23 MS. DODDAMANI: I'm getting there, judge.

24 MR. JOHNSON: There's no testimony that they know
25 about and clearly in Wisconsin a separate gang has now

1 formed, it's -- it's not relevant.

2 MS. DODDAMANI: I'm getting there judge.

3 THE COURT: Okay.

4 MS. DODDAMANI: My next question is, were they aware

5 of the meeting.

6 THE COURT: Okay. I -- I -- I think foundationally,

7 I'll take the objection, but I -- I -- I think that you can

8 lay a foundation, go ahead.

9 MS. DODDAMANI: Okay, thank you.

10 BY MS. DODDAMANI:

11 Q. Were, were Pete Musico and Joe Morrison aware of this

12 meeting?

13 A. Yes, they were.

14 Q. How do you know that?

15 A. Cause I monitored communications in which they told our

16 source Dan about the meeting and they asked him to bring

17 forward information to the leaders of the meeting regarding

18 the attack planning.

19 Q. Were they invited to attend?

20 A. They were.

21 Q. Okay. And those that attended you talked about already, but

22 was there a specific ask by Pete Musico during that meeting

23 of Dan?

24 A. There was.

25 Q. Tell me about that?

1 A. So Pete Musico contacted Dan while Dan was at the -- at the
2 meeting in Peebles Ohio and asked him to bring up the three
3 plan to Barry Croft.

4 Q. Okay. Let me ask you now, who arranged the meeting and what
5 was the meeting for?

6 A. So Barry Croft arranged the meeting in Peebles Ohio and the
7 meeting was the next evolution of the national attack plans.
8 So the first meeting was supposed to be recruitment and the
9 second meeting here in Peebles was supposed to be bringing
10 specific attack plans to the table so they could coordinate
11 which states would conduct attacks.

12 Q. So what was the specific ask that Pete made and in what form
13 did he ask?

14 A. So Pete used Facebook to send a message to my source Dan.

15 Q. Okay.

16 A. And asked him to be sure to bring up the three plan with
17 Barry.

18 Q. What's the three plan?

19 A. The three plan is Pete's idea of going into law enforcement
20 and politicians' homes at three a.m. and executing no knock
21 raids and either executing them or kidnapping them.

22 Q. Okay. And did you -- have you -- have you heard recordings,
23 monitored communications, made your own observations about
24 Pete Musico talking about this plan?

25 A. Yes. Pete has brought up this plan numerous times in

1 recorded phone calls to Dan.

2 Q. Okay. And I want you to look in your binder at exhibit
3 twenty-five please and tell me what that is?

4 A. So exhibit twenty-five is a Facebook message on Facebook
5 Messenger from Pete Musico to Dan.

6 Q. Dan the source, correct?

7 A. That's correct.

8 Q. And what's the date?

9 A. This is July 18th, 2020.

10 Q. And this is during the Peebles Ohio meeting or on that
11 weekend, is that correct?

12 A. Correct. It's while Dan was at the meeting.

13 Q. Okay. Is it fair and accurate?

14 A. It is.

15 MS. DODDAMANI: I'm going to ask for its admission?

16 THE COURT: Mr. Kirkpatrick?

17 MR. KIRKPATRICK: No objection.

18 THE COURT: Mr. Somberg?

19 MR. SOMBER: No objection.

20 THE COURT: Mr. Johnson?

21 MR. JOHNSON: No objection.

22 THE COURT: Okay. Exhibit twenty-five is, is
23 admitted.

24 (At 3:02 PX 25 admitted)

25 MS. DODDAMANI: Okay. I'm going to ask to be

1 displayed, please.

2 BY MS. DODDAMANI:

3 Q. All right. So you talked about communications Pete Musico
4 had with the source Dan. Go through this and tell us what's
5 happening?

6 A. Sure. So this is a back and forth via Facebook Messenger.
7 Pete Musico says sup, homey, Dan says oh just getting out of
8 the meeting. Pete says how did it go, and do you feel there
9 were any feds there, you know we're all terrorists now, peace
10 loving citizens terrorists, some bullshit. Dan says bound to
11 happen, was a matter of, if not, was a matter of if not when,
12 no feds, no direction really. Pete Musico asked is there a
13 tomorrow, bring up three.

14 Q. Okay. So hold on here and tell me what does that mean?

15 A. So is there a tomorrow is a reference to Pete's questioning
16 of attack plans and are we going to martyr ourselves or are
17 we going to be living to fight another day. In other words
18 when we attack will we be alive the next day.

19 Q. What does bring up three mean?

20 A. Bring up three is Pete asking Dan to bring up three a.m.
21 attacks, which is a code word that he'd established with Dan.

22 Q. Why at this meeting is Pete Musico saying bring up three to
23 the attendees of this meeting?

24 A. Well everybody attending this meeting was supposed to bring
25 forward their attack plans from their respective states. So

1 the national militia meeting, militia gathering could hash
2 out which plans they'd move forward with.

3 Q. Okay, thank you. Continue to read please?

4 A. Dan says I will tonight, on call, it was a cluster out of the
5 gate then we got rolling. Pete says okay if our team needs
6 to pull lead bro you know best.

7 Q. What does that mean?

8 A. That means if the Wolverine Watchman need to take a
9 leadership stance over all the other militias in the United
10 States Pete's enabling our source to go forward and do that,
11 to be the leader.

12 Q. Continue?

13 A. Dan said yeah, we just need to get everybody, excuse me, Dan
14 said yeah; we just need to get everyone who's down to go and
15 get a direction. Pete said and this is why they are winning.
16 Dan said just trying to get everyone on the same page, these
17 non-realistic things just take up time, how was talk weekend.

18 Q. Okay. You can take that down. Did everyone in the Peebles
19 Ohio meeting get on the same plan?

20 A. Well at the, at the Peebles Ohio meeting no, there were a
21 number of different attack plans came, that came to the table
22 and there was a lot of disagreement as to which attack plan
23 to go with moving forward.

24 Q. Okay. Now did, the people that did go down to the Peebles
25 Ohio meeting and you said Dan was there, the source, were

1 some of the members that are charged in the federal
2 kidnapping plot in attendance at this meeting?

3 A. Yes. So the Wolverine Watchman members Kaleb Franks, Dan
4 Harris and Ty Garbin were present at the Peoples Ohio attack-
5 planning meeting.

6 Q. And was Adam Fox there?

7 A. Adam Fox was there as well.

8 Q. Thank you. And Barry Croft was there as well?

9 A. So Barry Croft was there as well as Bill Null.

10 Q. Thank you. Let's talk about the next significant event that
11 occurs. I'm going to direct your attention to July 26, 2020.
12 What's happening on that date?

13 A. July 26th is a tactical training exercise at one of the
14 Wolverine Watchman members' homes in Fowlerville.

15 Q. Which, which member?

16 A. That was Kaleb Franks.

17 Q. Okay. Was that Kaleb Franks?

18 A. It's his family's property, I -- I just want to clarify.
19 It's not his house it's a family property.

20 Q. Thank you, thank you. And was this also recorded based on
21 your observations, all of the questions I've been asking?

22 A. Yes, this was recorded, live monitored and our source was
23 there.

24 Q. Okay. And was Paul Bellar there?

25 A. Paul Bellar was there.

1 Q. Was Mr. Musico or Mr. Morrison there?

2 A. No.

3 Q. Okay.

4 A. They were not there.

5 Q. What happens at this -- at this training of significance?

6 A. Well at this training Paul Bellar passes out the typed-out

7 exhibit with the code words following the chance, when

8 everybody had a chance to review it, they burned it and then

9 Paul Bellar recapped the Wisconsin trip and the code words to

10 newer members or other members of the Wolverine Watchman who

11 were not present at the July 7th security meeting at his house

12 and were not present in Wisconsin.

13 Q. So same question I had for you on a lot of these other

14 trainings what are sort of tactics that are practiced here?

15 A. So this training was designed for vehicle tactics, ambushes

16 and then responding to contacts if you're in a vehicle.

17 Q. What does that mean vehicle ambushes?

18 A. So that means, well in this training the Wolverine Watchman

19 were practicing having their firearms with them in a vehicle,

20 dismounting from the vehicle and firing at enemies from their

21 vehicle and then using the vehicle as a position of cover and

22 concealment.

23 Q. Okay. Were there live fire drills practiced at the training?

24 A. There were.

25 Q. And any other offensive tactics that we've kind of already

1 talked about?

2 A. There were primarily vehicle ambushes and responding to

3 contact in your vehicle.

4 Q. Did Mr. Bellar participate in these drills?

5 A. He did.

6 Q. Did he fire a weapon?

7 A. He did.

8 Q. Okay. And was there filming of some of this?

9 A. There was.

10 Q. Okay. And what was the purpose of filming some of these

11 things?

12 A. Well the purpose was to see their tactics for further

13 training, to be able to bring it to the group.

14 Q. Okay. And were they distributed the videos that were made

15 from this training?

16 A. Well our source Dan received videos, I -- I don't know if

17 they were distributed elsewhere.

18 Q. Okay. I'm going a -- you previously viewed a video marked

19 exhibit twenty-six, is that correct?

20 A. That's correct.

21 Q. Okay. And what does that, what does that video depict?

22 A. So that's a video of Paul Bellar and Brandon Caserta moving

23 out of a vehicle and shooting.

24 Q. Okay. And this was at this training, is that correct?

25 A. That's correct.

1 Q. Okay. I'm going to, is it fair and accurate?

2 A. It is.

3 MS. DODDAMANI: I'm going to move for its admission.

4 THE COURT: And what's the number?

5 MS. DODDAMANI: Twenty-six judge, thank you.

6 THE COURT: Okay.

7 MR. KIRKPATRICK: No objection.

8 MR. SOMBERG: No objection.

9 MR. JOHNSON: No objection, your Honor.

10 THE COURT: Okay. Twenty-six is admitted.

11 (At 3:09 p.m., PX 26 admitted)

12 MS. DODDAMANI: Okay. And I'm going to ask that it

13 be played?

14 (At 3:09 p.m., exhibit video played)

15 BY MS. DODDAMANI:

16 Q. Okay. And which, who was in that video?

17 A. So Paul Bellar was wearing the black shirt on the left side

18 in the driver's seat, he exited the driver's seat and Brandon

19 Caserta exited the passenger seat.

20 Q. Okay, thank you. So after this training what's the next

21 significant event that occurs in this investigation?

22 A. The next significant event is another training on August 9th

23 in Munith Michigan at Joe's residence.

24 Q. Okay. And who host that training and who is in attendance is

25 in the courtroom today?

1 A. Joe Morrison hosted the training and only Joe was present.
2 Paul Bellar and Pete Musico were not at that training.
3 Q. Okay. Was this recorded, live monitored, all those?
4 A. Yes, it was.
5 Q. Okay, thank you. And this was hosted at the Munith property
6 that Joe Morrison owns, is that correct?
7 A. That's correct.
8 Q. All right. Is this in fact the second training that Adam Fox
9 attends in the Munith property?
10 A. It is.
11 Q. And does Mr. Fox bring anyone with him?
12 A. Yes, Mr. Fox brings some members of the Michigan Patriots
13 Three Percenters.
14 Q. Okay. And specifically who?
15 A. He brings Mike Morais, I can't recall if he brought Amanda
16 Keller to this meeting or not.
17 Q. Okay. Did he bring Shawn Fix?
18 A. He did.
19 Q. Okay. And what are tactics that are trained on at this
20 training?
21 A. At this training they, they did weapons manipulation; I
22 believe there was a medical portion.
23 MR. KIRKPATRICK: Your Honor, I just want the record
24 to be clear that at this point my client is no, they I'm
25 asking for more clarification, your Honor and at this point I

1 think everyone here will agree my client is no longer in the
2 State of Michigan, will no longer be included in they.

3 MS. DODDAMANI: Judge, this is not the time to make
4 clarifications and arguments. I've laid these foundational
5 questions about who was there, and the agent was already
6 asked that. This is not an opportunity for argument.

7 THE COURT: Yeah, yeah that -- that -- that --
8 that's really just more of a clarification that I -- that I
9 think you can clear up on cross-examination. He has
10 indicated that -- that Paul wasn't there, if you need to
11 explain Paul's whereabouts at any point in time you can ask
12 the agent you know if you had that information, go ahead.

13 MS. DODDAMANI: Thank you, your Honor.

14 BY MS. DODDAMANI:

15 Q. I think we were at what, okay wait. I'm going, hang on a
16 second. So it's now August 9th, 2020 and Joe Morrison is
17 hosting this training at his house, is that correct?

18 A. That's correct.

19 Q. Is he still in communication with Adam Fox?

20 A. Yes.

21 Q. Is he still in communication with other Wolverine Watchman
22 members?

23 A. Yes, he's still in communication with Ty Garbin, Adam Fox,
24 Barry Croft, Brandon Caserta, Kaleb Franks, Dan Harris, Paul
25 Bellar.

1 Q. And how about Pete Musico, is he still in communication?

2 A. He is.

3 Q. Okay. What about Paul Bellar, he's -- he's left the state by

4 this point, isn't that correct?

5 A. That's correct.

6 Q. Okay. And we talked about how in August you went to his

7 apartment where there were items that were seized and

8 collected, correct?

9 A. That's correct.

10 Q. Okay. Now he is out of the state, what's your understanding

11 of why he's out of the state based on your observations,

12 investigation, etc.?

13 A. Well he spent his money on tactical gear, and he couldn't pay

14 his rent, so he needed to move down with his dad in order to

15 save money.

16 Q. Okay. And so he's no longer in the state by this training,

17 correct?

18 A. That's correct.

19 Q. Okay. Now this training is going on, let's get back to this

20 training. What tactics are trained on at this training,

21 that's a terrible question. But what -- what tactics are

22 trained, what -- what field exercises are conducted at this

23 training, sorry?

24 A. This is just a general training, weapons manipulation,

25 reloading, moving under fire, nothing, there was no

1 breeching, or anything particularly laid out.

2 Q. Okay. And was this all done with firearms in possession?

3 A. It was.

4 Q. Thank you. Is Adam Fox at this training?

5 A. He is.

6 Q. And what does he talk about with members of the Wolverine

7 Watchman when Joe Morrison is present?

8 A. Adam Fox brings up the concept of kidnapping Gretchen

9 Whitmer.

10 Q. How does he do that, what's the context?

11 A. They're all gathered around during a portion of the training

12 and Adam Fox says whose down for kidnapping.

13 Q. Does he -- does he say kidnapping, or does he say

14 specifically whom?

15 A. He does say Gretchen Whitmer and he says he, whose down for

16 kidnapping her.

17 Q. Okay. And what's the reaction of the group, is Joe Morrison

18 there?

19 A. Yes.

20 Q. What's the reaction and who's in the group that's listening

21 to this?

22 A. Well Dan is in the group listening and recording it, and then

23 all the other members of the Wolverine Watchman are there.

24 When I say all the other members, I guess it's a general

25 turnout. I -- I know I'm not providing specifics, Pete's not

1 there, Joe's there, Paul is not there.

2 Q. Okay. There's other members?

3 A. Yes.

4 Q. Can we call it that, all right? And what's the reaction of
5 the group when Adam Fox talks about this idea?

6 A. Well there was a negative reaction, people were surprised,
7 and they didn't take to it kindly. There was a lot of
8 questions being asked.

9 Q. Like what?

10 A. How are you going to do it, how are you going to succeed, why
11 would we do it this way, why are you bringing this up.

12 Q. Okay.

13 A. Things like that.

14 Q. Was there anyone that was like whoa, kidnapping, violence,
15 not okay; this is not something we should talk about right
16 now?

17 A. No.

18 MR. KIRKPATRICK: I guess I would object to the
19 characterization, the question is leading, it's testifying
20 almost, it's compound and he can testify to what his
21 observations were as far as what he's responding.

22 THE COURT: I --

23 MR. KIRKPATRICK: What he believes to be occurring.

24 THE COURT: I think it's probably more prudent to
25 let him characterize his observations.

1 MS. DODDAMANI: I'll rephrase it judge.

2 THE COURT: Okay. So I'll sustain that.

3 BY MS. DODDAMANI:

4 Q. Was there anyone that alerted the group the idea of not being
5 down with this plan?

6 A. Not that I'm aware of.

7 Q. Okay. Was it discussed again after this negative reaction in
8 the bigger group?

9 A. Yeah, so there was a smaller group that assembled after the
10 training was done, before, when some people had left, and
11 they talked specifically about the kidnapping plot.

12 Q. Who is they?

13 A. In this case it was Shawn Fix, Mike Morais, Adam Fox and Joe
14 Morrison.

15 Q. Thank you. And what was the discussion; tell us what
16 happened and what Mr. Morrison's part in that was?

17 A. Well they -- they all expressed support in the kidnapping
18 plot; they said they were good with the plot. Shawn Fix
19 brought up different weapons they could use to further the
20 plot and they all agreed that although it didn't go over well
21 with the group, they were all in.

22 Q. Did Joe Morrison verbally confirm that he was in?

23 A. Yes, he was asked if he was in and he said he was good to go.

24 Q. Okay. What's the next major event that happened in this
25 investigation after this 8-9 training in Munith?

1 A. Well after 8-9 in Munith the next major event, which these
2 members were not part of was a daytime surveillance, physical
3 surveillance and recon of the governor's residence up in Elk
4 Rapids.

5 Q. Okay. So the kidnapping plot actually advanced, is that what
6 you're testifying to?

7 A. Yes, that's correct.

8 Q. Okay. And then after that was there any other major events?

9 A. Yes, yeah so, the next major event was the national training
10 exercise in Luther Michigan during the weekend of September
11 10th, 2020.

12 Q. Were any of these three individuals in attendance at that
13 training?

14 A. No, none of these individuals were present.

15 Q. Okay. Who hosted that training?

16 A. Ty Garbin hosted that training at his property.

17 Q. Okay. Was Joe Morrison, Pete Musico and Paul Bellar aware of
18 this training?

19 A. They were.

20 Q. How do you know that?

21 A. Well Paul Bellar was present when they started planning the
22 training in Wisconsin and offered it to the national group.
23 They offered Ty's property to Barry Croft and Adam Fox and so
24 the training had been on the books for their itinerary for a
25 while. I know that Pete and Joe were invited to the training

1 because I had recorded phone calls that I monitored with Adam
2 Fox and Dan in which Adam Fox stated he invited them, and he
3 was hoping they were going to come.

4 Q. Okay.

5 A. And they said they were going to try to come.

6 Q. Did they plan on coming based on your observations,
7 monitoring, recording?

8 A. Yes, they -- according to Adam Fox they were going to be
9 coming to the training.

10 Q. Okay. And did they actually attend?

11 A. They did not.

12 Q. Okay. And that was a national militia training, is that
13 correct?

14 A. That's correct.

15 Q. Organized by members of the Wolverine Watchman?

16 A. That's correct.

17 Q. And did Adam Fox attend that training?

18 A. He did.

19 Q. At that training did the governor kidnapping plot advance
20 with attendees?

21 A. It did.

22 Q. In what way?

23 A. Well Adam Fox selected specific operators during the training
24 and then during the night of September 12th he arranged for a
25 physical surveillance and recon at night of the governor's

1 lake home in Elk Rapids.

2 Q. Okay. All right. So to be clear here on the record the
3 people that were involved, that were Wolverine Watchman
4 members in that plot were whom?

5 A. So the Wolverine Watchman members were Ty Garbin, Daniel
6 Harris, Brandon Caserta, Kaleb Franks, those -- those were
7 the operators from the Watchman who were participating in the
8 plot?

9 Q. Thank you. Adam Fox also part of that?

10 A. Yes, Adam Fox and Barry Croft were also participating in the
11 surveillance and in the plot.

12 Q. Okay, thank you. So ultimately, two surveillances of the
13 governor's property occurred following the testimony that
14 we've talked about here? All the events that we talked about
15 here.

16 A. That's correct.

17 Q. Okay. What is operators and facilitators? Can you tell us
18 what that means?

19 A. Sure. So from my training in the FBI and how we classify
20 cases and talks operators are those individuals who'll be
21 specifically engaged in a terrorist plot. So they'll be the
22 ones who will be boots on the ground engaged in fighting or
23 carrying out that plot. A -- a facilitator is somebody who
24 is in a support role, so they might be a radicalizer, a
25 recruiter, a financier, they might provide a training venue.

1 They might not know specifically about the plot, but they're
2 providing the means necessary for the plot to occur.

3 Q. Okay. And so the difference between the two is what?

4 A. Well the difference between the two is just there role in the
5 terrorist plot. What action they're going to do.

6 Q. What support they're providing?

7 A. Correct. What material support there -- they're providing
8 towards that political violence.

9 Q. Okay. And having worked these cases for eleven years was the
10 three individuals that are seated in the courtroom, how would
11 you classify them as operators or facilitators?

12 MR. KIRKPATRICK: Your Honor, that asks for
13 speculation, facts not in evidence. He's not an expert to
14 determine whether they're a facilitator. That's your --
15 that's your province, your Honor. For him to make an expert
16 opinion at this point, whether my clients a facilitator of
17 this or not I don't think is something that this witness is
18 qualified to answer, and I don't think that it's -- that
19 either basically asking for an expert opinion on whether or
20 not my client is a facilitator and talk about bringing him
21 into this terrorist plot.

22 MR. JOHNSON: Your Honor, I was going to say the
23 same thing and furthermore the reference that he's been doing
24 these type of cases for eleven years I think those facts are
25 not in evidence. So he said he's been an agent for eleven

1 years, but I thought he worked in (inaudible) and he's been
2 in, investigating terrorist cases for eleven years.

3 MS. DODDAMANI: I think he's spoken about how he has
4 eleven years of domestic terrorism investigation. So I'm
5 asking judge not for an expert opinion here, I am asking for
6 these are concepts that are used in the terrorism world and
7 I'm asking for him in this, in these terms whether he is,
8 whether his investigation revealed based on the facts in
9 evidence of this investigation that we've spent many hours
10 here discussing today, whether these individuals are
11 operators or facilitators. And I think he can do that based
12 on his training and experience. It's not an opinion and it's
13 certainly not as an expert opinion. I'm not asking for that.

14 THE COURT: If you're asking me or if you're asking
15 him to indicate to state whether the three defendants are
16 operators or facilitators based on interpretation of internal
17 FBI guidelines or internal FBI vernacular that's irrelevant
18 because that's not were -- what we're here to decide. On the
19 other hand if you're asking for his expert opinion, I think
20 he qualifies for an expert as -- as an expert and even though
21 it is ultimately my decision whether these individuals are
22 terrorist or not and if they are terrorist whether they're a
23 facilitator or operator, as an expert he can give that
24 opinion.

25 MS. DODDAMANI: Then I'll move to qualify him as an

1 expert.

2 THE COURT: Well he's qualified, go ahead an answer.

3 THE WITNESS: I'm sorry can you repeat the question?

4 BY MS. DODDAMANI:

5 Q. Yes. The question is are these three individuals in the
6 courtroom considered by you to be an operator or -- or
7 facilitator?

8 A. So Pete Musico, Joe Morrison and Paul Bellar are terrorist
9 facilitators based on my investigation.

10 Q. Okay. Would you expect facilitators to know final attack
11 plans, all the aspects of final attack plans of operators?

12 A. No I would not.

13 Q. Why not?

14 A. Well for operational security concerns. Once you focused in
15 on a target and you have a -- a team ready to attack anybody
16 who knows the final attack plans provides risk that the
17 attack will be stopped. That law enforcement would somehow
18 be able to intercede. And this is something that Paul
19 Bellar, Joe Morrison and Pete Musico preached religiously
20 through my live recordings OPSEC, and that was one of the big
21 things that they brought to Adam Fox. So in this particular
22 case which is not different from many other terrorist cells
23 or terrorism plots it's not surprising and it's not out of
24 the ordinary that they didn't know the details of the final
25 attack plan.

1 Q. Okay.

2 MS. DODDAMANI: I'm sorry judge can I have just one
3 moment, we're wrapping it up at this point with the direct.
4 Got it, all right.

5 BY MS. DODDAMANI:

6 Q. I just have a couple of like closing questions here. Was,
7 did anyone else out of the Wolverine Watchman, of all the
8 members that kind of filtered through the group and -- and
9 went to different things did anyone else besides Dan, your
10 source, ever come forward to inform law enforcement of attack
11 plans or -- or plans for politically motivated violence?

12 A. No, nobody else came forward to law enforcement.

13 Q. Okay. When you texted Dan ask him to report back to you,
14 were you asking him to keep detailed notes of things like
15 dates, like exact sentences. Were you asking him to do any
16 of that work, how does this work with a source and a handler?

17 A. Sure. Let me try to explain. So as a handler it's my job to
18 document the facts and Dan is basically the eyes and ears.
19 So I asked him to just report back and then move on. I told
20 him his number one job was to stay safe and keep his access
21 to the group and it was my job to document what was happening
22 and see if any laws have been broken to bring the case to a
23 prosecutor. And then it's my job to determine when the group
24 was getting ready to attack and to try and affect an arrest
25 or somehow stop any attack plans so that nobody got hurt.

1 Q. Okay.

2 MS. DODDAMANI: Thank you judge, I think, I think
3 I've wrapped up now and I don't have any more questions of
4 this witness.

5 THE COURT: Okay.

6 MR. KIRKPATRICK: Your Honor, we may just want to
7 take a five, could we take a five-minute break before I get
8 started because I am probably going to be a minute with this
9 witness.

10 THE COURT: Okay, okay. Let's come back at twenty
11 to four.

12 MR. KIRKPATRICK: Thank you, your Honor.

13 MS. DODDAMANI: Thank you, judge.

14 (At 3:28 p.m., recess)

15 (At 3:38 p.m., back on the record)

16 THE COURT: Okay. We're back on the record and
17 we're starting cross-examination with Mr. Kirkpatrick, go
18 ahead.

19 MR. KIRKPATRICK: Thank you, your Honor, if I bounce
20 around a little bit I apologize, it's just kind of a bouncing
21 around case and no offense to the prosecutor, there's a lot
22 of information here.

23 CROSS EXAMINATION

24 BY MR. KIRKPATRICK:

25 Q. An it's Agent Impola, am I saying that correctly?

1 A. Impola.

2 Q. Impola, if I say it incorrectly, I'm apologize.

3 A. No worries, thank you.

4 Q. So we started this investigation, and you filed this

5 investigation all the way, I believe your testimony was from

6 March time frame all the way through to October when the

7 arrest took place, is that a fair statement?

8 A. That's correct. The investigation is still ongoing, but that

9 was the overt take down on October.

10 Q. And you were pretty much made aware of all the training that

11 was going on through Wolverine Watchman during the time

12 period of your investigation, is that a fair statement?

13 A. Yes.

14 Q. Throughout this training you talk about kill houses, I think

15 that the Court saw some -- some a training in a kill house,

16 correct?

17 A. That's correct.

18 Q. That kill house is, was not set up as the State Capital

19 correct?

20 A. Well there was a few different kill houses.

21 Q. Okay.

22 A. And we talked about that as investigators a lot and we don't

23 know. We weren't part of, we don't have information about

24 how this set up and we tried to compare and determine if it

25 was set up like that, but we couldn't tell.

1 Q. Well we saw the video of the one that, that occurred in
2 Wisconsin correct?

3 A. Sure, yes, I did.

4 Q. You would agree with me that that was just a bunch of plywood
5 in a makeshift door, fair statement?

6 A. That was the initial room, it continued on, and so there was
7 a series of rooms beyond the video. That was the initial
8 entry, but generally speaking I agree with that, it's just a
9 makeshift door and rooms.

10 Q. And prior to the training Mr. -- Mr. Bellar, Bellar would
11 have been involved in there was no talk of hey guys this kill
12 room is the Capital; we got to stimulate our storming of the
13 Capital, correct?

14 A. I didn't hear any of that conversation.

15 Q. Or this kill house is Governor Whitmer's residence, we have
16 to prepare for this storming of Governor Whitmer's residence,
17 never heard that either, correct?

18 A. I did not hear that.

19 Q. You heard basic training of kill houses, fair?

20 A. That's fair.

21 Q. Basic training of maneuvers where individuals may be
22 attacking you, correct?

23 A. That's fair, yes.

24 Q. And those individuals you testified to not only could they be
25 law enforcement, but they could be other individuals, is that

1 a fair statement?

2 A. In a hypothetical they could be anybody, I think.

3 Q. Absolutely. So when you talk about their training for the
4 ultimate Boogaloo, the ultimate civil war that is not
5 necessarily mean you're going to be fighting law enforcement
6 correct, only law enforcement let me rephrase that?

7 A. Well these guys were specifically training for fighting with
8 law enforcement. Others, other general Boogaloo people I
9 don't know, I can't testify to what they're talking about.

10 Q. So when we're talking about preparing for fighting with the
11 law enforcement did they ever prepare on specific police
12 precincts and I'm talking about my client not anyone else?

13 A. Yes, so they talked about attacking a police precinct in
14 Battle Creek and they talked about your client, Paul Bellar,
15 spoke with Adam Fox about fire bombi8ng police precincts in
16 Michigan during protests in order to distract law enforcement
17 for future attacks.

18 Q. My question is not what they talked about; did they actually
19 train to breach a specific law enforcement facility in the
20 State of Michigan? Facility itself, did they actually train
21 to do that, not talking I'm talking about training now?

22 A. I would say the training was general tactics; it was not
23 specific to a law enforcement facility.

24 Q. You talked about, strike that. You never recovered or your
25 informant never told you that any of these three, well

1 specifically my client had drawn up any plans of the State
2 Capital, correct? And what I mean by that is entryway, where
3 the rooms are and how to maneuver through the Capital. You
4 were not made aware of my client ever drawing up any type of
5 plan for the Capital, correct?

6 A. That's correct.

7 Q. You were also never aware of my client drawing up any plans
8 or maps of Governor Whitmer's residence, correct?

9 A. That's correct.

10 Q. Or Governor Whitmer's up north cottages, correct?

11 A. That is correct.

12 Q. So basically this was basic training for interactions with
13 law enforcement or whomever in the event that the Boogaloo
14 kicks off, is that a fair statement?

15 A. I think it was offensive training designed to fight with law
16 enforcement. I wouldn't call the training they performed is
17 not typical to other militias, not typical training, general
18 firearms training.

19 Q. Okay. Throughout your entire investigation, not one time did
20 Mr. Bellar, Bellar actually, physically assault an officer,
21 correct?

22 A. That's correct.

23 Q. At no time during this investigation did Mr. Bellar actually
24 point a firearm at a law enforcement officer, correct?

25 A. That's correct.

1 Q. At no time during this investigation did Mr. Bellar actually
2 make a Molotov cocktail, correct?

3 A. Not that I'm aware of.

4 Q. At no time did Mr. Bellar commit any act of violence against
5 any member of Michigan, correct?

6 A. I would agree with that.

7 Q. So this was a lot of talk, right?

8 A. It was definitely more than talk.

9 Q. And training?

10 A. It was planning.

11 Q. Okay planning. My client teaches medic information, at these
12 trainings?

13 A. That's correct.

14 Q. What specifically was he -- what -- what specifically was he
15 training?

16 A. He was training how to use an I fact (sic) kit, how to use
17 tourniquet, how to use combat gauze, how to use tactical
18 shears. So this is all combat medicine to basically stop a
19 massive hemorrhage and keep people alive who get shot.

20 Q. Which could absolutely happen if there is a so-called
21 Boogaloo correct?

22 A. That's correct.

23 Q. You would agree that you're an FBI agent, you know a lot
24 about what's going on in society today, fair statement?

25 A. Sure.

1 Q. You've seen what -- what's going on in Seattle where they
2 cordoned off blocks and blocks of streets, correct?

3 A. That's correct.

4 Q. You've seen what's going on in Portland with the protest
5 there; in fact, it's been going on for quite some time,
6 correct?

7 A. Yes.

8 Q. And you've seen numerous rallies where have become violent,
9 correct?

10 A. Correct.

11 Q. And so citizens, would it be fair to say that some citizens
12 could be getting a little concerned about the possibility
13 that there may be some kind of a civil uprising in the United
14 States?

15 A. I think that's fair.

16 Q. And in fact, some citizens may train for that, fair?

17 A. Yes.

18 Q. I want to go back to April, I'm sorry not April, it's
19 actually April 30th. You talked about when my client went to
20 a rally, the legislative rally regarding the emergency
21 orders, do you recall testifying about that?

22 A. I do.

23 Q. And do you recall testifying about how you -- you listened to
24 them or you actually get, I think you got information about
25 what they were planning prior to going to the Capital, to the

1 Capital?

2 A. That's correct.

3 Q. Your testimony was that there was discussions about how they

4 -- they could breach the door of the Capital?

5 A. That's correct.

6 Q. And how they could look out for MSP officers, correct?

7 A. Correct.

8 Q. And how they could watch over each other while they breached

9 the door of the Capital, correct?

10 A. That's correct.

11 Q. In fact they walk up to the Capital, right?

12 A. That's correct.

13 Q. They're armed, they go the front door, are you aware that

14 they actually walked through the front door of the Capital,

15 are you aware of that?

16 A. I am.

17 Q. Are you aware that they actually answered securities COVID 19

18 questions, are you aware of that?

19 A. I am.

20 Q. Are you aware that they also took their temperature to insure

21 that they were allowed access into the Capital for this

22 protest that they were doing?

23 A. I am.

24 Q. You're also aware that they committed no acts of violence

25 during that protest at all, correct?

1 A. That's correct.

2 Q. And had they, they would have been arrested immediately, fair
3 statement, right?

4 A. No, I don't think that's a fair statement.

5 Q. You don't think it's a fair statement?

6 A. Absolutely not.

7 Q. Okay. Well let me rephrase it then. If they would have
8 broke the law at one point or another charges would have been
9 requested against them, is that a fair statement?

10 A. If we were able to identify them, yes.

11 Q. Okay.

12 A. I, what I'm thinking of is the -- the riots on January 6th in
13 which many people inside aren't able to be identified and
14 arrested, it's chaos so it's hard to make a -- a normal
15 judgment call.

16 Q. Well let's talk about this one on April 30th when your
17 testimony was somewhat characterized when they stormed the
18 Capital. To your knowledge Mr. Bellar --

19 MS. DODDAMANI: I'm going to object your Honor; I
20 think that's a mischaracterization of his testimony.

21 MR. KIRKPATRICK: Let me, and it is.

22 THE COURT: Okay.

23 MR. KIRKPATRICK: I apologize.

24 THE COURT: Okay.

25 MR. KIRKPATRICK: Let me rephrase that.

1 BY MR. KIRKPATRICK:

2 Q. When they were having this conversation that you eluded to
3 about how they were going to breach the Capital and go in
4 there and cause all these problems. On that particular day,
5 you were not made aware of any illegal activity that Mr.
6 Bellar was involved in correct?

7 A. On that day?

8 Q. Yes, on that day, I'm just talking about the 30th.

9 A. Sure, yeah, no I don't think there was any illegal activity.

10 Q. It's legal to have firearms at the Capital, correct?

11 A. Yeah, I mean a -- I have a hard time cause they were in the
12 midst of planning.

13 Q. I get you might have had a hard time, but the law is the law
14 and at that particular time --

15 MS. DODDAMANI: I'm sorry can he let -- can you let
16 him finish his answer please, that's my objection.

17 THE COURT: Let -- let him finish, I think he was a
18 bit interrupted.

19 THE WITNESS: So I agree that individually
20 protesting and holding firearms, that Paul Bellar could
21 legally do that. As far as -- as they were watching and
22 looking at MSP's tactics at the Capital and talking about
23 storming it whether that was illegal on that day or not, I
24 don't know.

25 BY MR. KIRKPATRICK:

1 Q. Well let me ask you this agent. Do you think it's illegal to
2 just merely talk about something, do you think that in and of
3 itself is illegal?

4 A. It can be, certainly.

5 Q. Can be, okay. In this case do you think them merely talking
6 about what they were talking about, you believe that that in
7 and of itself is illegal?

8 MS. DODDAMANI: Judge I'm -- I'm going to object
9 here because I think he's asking the witness to make legal
10 conclusions and I've let him do that for a couple of
11 questions, but I think if that's the goal here --

12 MR. KIRKPATRICK: He's an expert.

13 MS. DODDAMANI: -- and a witness cannot make legal
14 conclusions about the law.

15 THE COURT: This is cross-examination, I'll -- I'll
16 -- I'll let him answer that.

17 BY MR. KIRKPATRICK:

18 Q. So your belief is an individual can be arrested and charged
19 just for merely saying something?

20 A. That's correct. And I should clarify, not for merely saying
21 something it'd have to fall under a terroristic threat or
22 some sort of threatening communication. You'd have to match
23 the element of that law.

24 Q. Okay. So you would agree with me that you have to say
25 something and then do a little something else?

1 A. No, you definitely don't have to do anything.

2 Q. Okay. Fair to say, fair answer. During, so I think you
3 testified that they had gone to a total of, was it four to
4 six protest at the Capital? Do you recall how many they
5 actually went to?

6 A. Well they weren't all at the Capital, I think that was a
7 generalization of all the protest they'd gone to. They went
8 to some other Black Lives Matter protest in Lake Orion and
9 Detroit and in Washtenaw County. So that's a -- an overall
10 estimate of all their protest that I'm aware of.

11 Q. You would agree with me that every protest my client, Mr.
12 Bellar, attended he was not arrested at any of those,
13 correct?

14 A. That's correct.

15 Q. He was not accused of breaking the law at any of those
16 protests, correct?

17 A. That's correct.

18 Q. You talked about the training that Mr. Bellar did, it was
19 medic training, was he the, he wasn't the lead tactical
20 trainer of this group, correct?

21 A. No, he was the lead tactical trainer.

22 Q. He was, he was the lead tactical trainer and the lead medic
23 for this group?

24 A. That's correct.

25 Q. At every training session that he went to?

1 A. Well our source Dan assisted him with tactical training.

2 Q. Okay.

3 A. So I, as far as who stood up and gave direction Paul Bellar

4 certainly defaulted to Dan on certain tactical exercises and

5 trainings that Dan had more experience on from his service to

6 the country overseas.

7 Q. In fact your informant actually taught Mr. Bellar a lot of

8 the things he actually taught to the group, correct?

9 A. Our informant taught a lot of the things to the group

10 including Mr. Bellar; I think that's a fair statement.

11 Q. Okay. The training that happened, there was some meetings at

12 his house regarding discussions, but all the actual live fire

13 training that actually happened on property not belonging to

14 him, he didn't own the property if they were doing live fire?

15 A. That's correct.

16 Q. There was, you monitored I'm assuming all of the

17 communication between your confidential, confidential human

18 source, is that what you call him?

19 A. That's what we call him.

20 Q. Confidential informants here.

21 A. You got the federal, you got the federal acronyms.

22 Q. Right. So you monitored all of his conversations with Mr.

23 Bellar and all the other individuals in, involved that you

24 were watching group, correct?

25 A. That's correct.

1 Q. And around April of 2020 Mr. Bellar made clear to your
2 confidential human source that he was very upset with the
3 individuals in the group were messing around with explosives,
4 do you recall that?

5 A. I do.

6 Q. And in fact, Mr. Bellar made it very clear, I think he said
7 WTF, which means what the fuck, correct?

8 A. Yes.

9 Q. Pardon my language, your Honor. And he talks about them
10 messing around with explosives, is that correct?

11 A. I recall that, yes.

12 Q. And it's clear from this that Mr. Bellar did not want to deal
13 with explosives at that particular moment in time, correct?

14 A. I think he was genuinely concerned for his safety when Pete
15 Musico brought out what the group thought was C-4.

16 Q. Correct. And when -- so he had -- Mr. Bellar had concerns
17 about those explosives, correct?

18 A. That's correct.

19 Q. You talk about the Wisconsin trip and again I'm doing this
20 because we're talking about the explosives again. You talked
21 about Mr. Bellar went to Wisconsin for further training and
22 at that training another individual, not my client, started
23 dealing with IED's, improvised explosive devices, correct?

24 A. That's correct.

25 Q. It was not my client that built any of those, correct?

1 A. You're correct; your client was not involved in that.

2 Q. It was not my client that set off any of that, correct?

3 A. That's correct.

4 Q. And in fact did your confidential human source tell you that

5 my client was actually in the vehicle with the door shut

6 because of his concern of the explosion?

7 A. I heard on the recording both my source and the vehicle or

8 excuse me, and Paul Bellar talking about -- in the fact

9 you're claiming in particular now that you bring that up was

10 worried about the shrapnel hurting the kids in the area at

11 the training.

12 Q. So he actually brought that to people's attention, his

13 concerns and what they were doing with these IED's, correct?

14 A. He brought it to our source Dan's attention. I don't know if

15 he brought it to anybody else, but I heard it on the line of

16 the recording.

17 Q. When -- when you -- it wasn't Mr. Bellar that brought in Fox

18 to your group correct?

19 A. That's correct.

20 Q. And I think you testified that Adam Fox went to his first

21 training on June 28th, does that sound about right?

22 A. Yes.

23 Q. And in total up until August, up until August 9th when Mr. Fox

24 went back to training, that was the second time that he had

25 trained in Munith, is that a fair statement?

1 A. Yes.

2 Q. So in fact Mr. -- Mr. Fox trained in Munith on his -- on June
3 28th of 2020 correct?

4 A. That's correct.

5 Q. And did not train again until August 9th of 2020, is that
6 correct?

7 A. Well he didn't train in Munith.

8 Q. Right.

9 A. Yes, that's correct.

10 Q. Okay. And my client was -- was my client present for the
11 June 28th of 20 training with Mr. Fox?

12 A. Yes.

13 Q. He was not present on August 9th of 2020, correct?

14 A. That's correct.

15 Q. That's because he had left the state of Michigan around July
16 27th of 2020, is that a fair statement?

17 A. Yes, that is fair.

18 Q. The Watchman group, that training in Wisconsin, do you recall
19 when that was?

20 A. I'm sorry what training?

21 Q. The training in Wisconsin, I'm sorry.

22 A. Oh yes, that was in July.

23 Q. When in July do you recall the date?

24 A. It was the weekend of July 10^t through July 12th.

25 Q. Okay. Was that during the same time period when Mr. Bellar

1 told the Watchman I'm done with your group?

2 A. I'm not aware of that.

3 Q. You're not aware of that?

4 A. No.

5 Q. You're not aware that Mr. Bellar around July 14th told the

6 Watchman he was no longer going to be a part of the group?

7 A. I'm aware of earlier in June he sent our source a message

8 saying he was thinking of leaving the Watchman. But I'm not

9 aware of anything he said in Wisconsin.

10 Q. Okay. So in June he's telling you that I'm thinking of

11 leaving the Watchman?

12 A. That's correct.

13 Q. Were you the only agent that handled this case or were you,

14 was there a co-agent with you, was there someone else that

15 worked with you?

16 A. Yeah, so the case, co-case agent Jason Chambers at the table

17 here was my counterpart for the Wolverine Watchman terrorism

18 enterprise case.

19 Q. Who had more involvement in this case, you or that other

20 agent?

21 A. I'd say it was equal, we had a separate specialties and roles

22 that we fell into naturally during the case, but I'd say the

23 division of labor was equal.

24 Q. Are there things that you've testified to today that you're

25 going off his reports and not your own memory or is

1 everything you're testifying today going off what you heard
2 and/or observed on the Wire?

3 A. So, everything I'm testifying today is what I've observed
4 during the Wire. Agent Chambers is the actual agent who is
5 performing the screen captures on the Wire, and documenting
6 it, that was one of his roles.

7 Q. Okay.

8 A. I was, I was monitoring it, but he was taking care of those
9 reports.

10 MR. KIRKPATRICK: Your Honor, may I have just a
11 minute to look, I'm looking for something, I apologize to the
12 Court.

13 BY MR. KIRKPATRICK:

14 Q. So some of this stuff, some of these texts, you've been ready
15 a lot of text messages to the Court?

16 A. Yes.

17 Q. A lot of exhibits have been introduced as far as text
18 messages, is that correct?

19 A. Yes.

20 Q. So I would assume either you or your joint agent received
21 that information?

22 A. That's correct.

23 Q. Do you, and you don't recall ever receiving any text messages
24 off of my client's phone. Did you do the dump on my client's
25 phone for text messages?

1 A. I did not do the dump off your client's phone.

2 Q. Okay. Did you look at all the text messages that were on my
3 client's phone before testifying today?

4 A. No, I don't have access to that.

5 Q. Okay. So that would have been your co-investigator?

6 A. No, the Michigan State Police executed the search warrant,
7 and have his phone so I haven't -- I don't have access to
8 that evidence.

9 Q. Okay. Gotcha.

10 MR. KIRKPATRICK: Your Honor, may I approach?

11 THE COURT: Yes.

12 BY MR. KIRKPATRICK:

13 Q. Don't' read this out loud just take a look at it; let me know
14 if you recognize the document or not because if you don't
15 then I'm not going to be asking you and questions regarding
16 it.

17 A. Yeah, I recognize this.

18 Q. You recognize that document?

19 A. Yep.

20 Q. Okay. And without reading what it is what does that -- what
21 does that document to you, what is it, how do you recognize
22 it?

23 A. It resembles a screen capture that my source did of
24 individual text messages between himself and Paul Bellar.

25 Q. Okay. And in fact in this message Mr. Bellar makes it clear

1 that he left, he was leaving the Watchman, correct?

2 A. No.

3 Q. Okay. He doesn't make that clear?

4 A. No.

5 Q. You didn't, were you made aware or did your confidential

6 human source make you aware that Mr. Bellar and the training

7 around July 10 time frame, they had a riff because my client

8 brought a female to training?

9 A. Yes, I'm well aware of that.

10 Q. And you're -- are you aware that as a result of that, that my

11 client had an issue with the group and at that point

12 disassociated himself from the group and started to form his

13 own group. Are you aware of any of that?

14 A. I'm aware of the drama regarding his girlfriend at the

15 training. I'm aware of Paul Bellar taking a more active role

16 in the QRF and establishing a ghost group, and I'm aware of a

17 lot of discussion as to his continued involvement in the

18 group. I'm familiar with all that. I did not know that he

19 had taken action to start his own group, although I do know

20 that he told Dan our source that when he got to North

21 Carolina with his father he intended to continue training and

22 to have his own group and that he'd always be there in case

23 they needed anything.

24 Q. Did he, is that something you put in your reports that he

25 said that to your -- your -- your. --

1 A. I specifically

2 Q. -- our -- your human source?

3 A. I inspected our sources phone, saw the communication, had
4 them screen captured and included them in discovery.

5 Q. Okay. So I should be able to find those?

6 A. Yes.

7 Q. Okay. To your knowledge do you have any documents with the
8 exception of Mr. Bellar reaching out after you had searched
9 his home, do you have any documents supporting what position
10 that Mr. Bellar continue his training after he left the State
11 of Michigan, the end of July of 2020?

12 A. No.

13 Q. We talked a minute ago about Mr. Bellar's leaving the State
14 of Michigan, and you testified that he was leaving because he
15 ran out of money?

16 A. Yes, that's what he told our source.

17 Q. Okay. There's actually a message.

18 MR. KIRKPATRICK: May I approach, your Honor?

19 THE COURT: Yes.

20 BY MR. KIRKPATRICK:

21 Q. I'm showing you what's been marked as Peoples, as defendants
22 Bellar one. Do you recognize that document?

23 A. I do.

24 Q. Is that a document that -- is that a report that you
25 generated?

1 A. I believe this is a report that my partner Jason Chambers
2 generate (sic) -- generated.

3 Q. Okay. So, but that is a record that was, would be kept in
4 your ordinary course of business as a -- as a FBI agent
5 correct?

6 A. That's correct.

7 Q. And in fact that is a text message thread between my client
8 and several members of the Watchman, is that a fair
9 statement?

10 A. Yes. It's a Wire thread.

11 Q. Right. And it accurately depicts that communication much as
12 all the other ones that you've been reading this morning and
13 this afternoon as well, correct?

14 A. Yes.

15 MR. KIRKPATRICK: Your Honor I move for the ad -- th
16 admission of defendant's exhibit Bellar one.

17 MS. DODDAMANI: Judge, I recognize it's a police
18 report, which is a hearsay document, but I'm not going to
19 object to its admission, thank you.

20 MR. KIRKPATRICK: Well, I'm sorry your Honor.

21 THE COURT: Okay. I'm assuming neither of the
22 defendants have any objection?

23 MR. JOHNSON: No, your Honor.

24 MR. SOMBERG: No, your Honor.

25 THE COURT: Okay. I'll go ahead and admit it.

1 (At 4:05 p.m., DX Bellar 1 admitted)

2 BY MR. KIRKPATRICK:

3 Q. Agent Impola.

4 A. Impola.

5 Q. Impola, I'll get it straight.

6 A. No worries.

7 Q. If you could do me a favor and do what you did for the

8 prosecutor when she was showing those exhibits, and if you

9 could start on -- on this front page and it starts off with

10 page two.

11 MR. KIRKPATRICK: Your Honor would the Court like a

12 copy?

13 THE COURT: Yeah, that would be good.

14 MS. DODDAMANI: And how is this marked?

15 MR. KIRKPATRICK: Bellar one.

16 MS. DODDAMANI: Bellar one, thank you.

17 MR. TOWNSEND: Is it going to be Bellar eight,

18 shouldn't it be Bellar eight?

19 MR. KIRKPATRICK: One, do you want us to do A or 1,

20 your Honor.

21 THE COURT: One is fine.

22 MS. DODDAMANI: Okay.

23 BY MR. KIRKPATRICK:

24 Q. So if you could do me a favor, if you could go on the first

25 page, down at the bottom you see where it starts off Paul

1 Bellar considering moving to South Carolina, do you see that?

2 A. I do.

3 Q. If you could please read to the Court how you read it

4 earlier, this text message thread regarding this issue?

5 A. Sure. So this is page two, but it's the cover page of Bellar

6 exhibit one, the title is Paul Bellar considering moving to

7 South Carolina and, and these are verbatim screen, copies of

8 the Wire Chats and it says on 7-27-2020 after receiving

9 estimated costs of repair to his vehicle Paul Bellar stated

10 the following. Doc, all right so I'm thinking about getting

11 a fresh start you guys. I've got too much debt going on and

12 the only thing really keeping me here is you guys. Would you

13 like me to read the full second page?

14 Q. Yes please, if you read the next page.

15 A. Okay. Beeker, which is Dan Harris, replied, French Foreign

16 Legion, five years, new identity. Doc, which is Paul Bellar

17 stated well my dad said he's not moving back to Michigan and

18 offered me to move into his home in South Carolina to stack

19 up some cash, get rid of debt and start taking classes into

20 the stuff I want to do. Beeker replied, oh, Dan Harris

21 replied or that. Gerald, which is Jared Beauchense replied

22 gotta do what's right for you brotha. Beeker, Dan Harris

23 replied yeah man; Paul Bellar replied I'm honestly probably

24 going to. Jarod Beauchense or Bushane I think is how you say

25 it, replied we'd all miss ya for sure, but if it's what you

1 gotta do then you got to look out for number one. Red Hot,
2 which is Kaleb Franks, replied yeah, I agree whatever you
3 think is best man. It'd be selfish for us to have, to have
4 you stay. Doc replied or excuse me Paul Bellar replied I
5 don't know if it'd be permanent, I'd possibly come back, but
6 I really want to get rid of my debt, stack up some axel money
7 and get my paramedic license. Dan Harris replied pretty sure
8 Beaufort County has some good paramedic course, fuck who
9 knows. Maybe you could get into Paris Island and contract as
10 a paramedic and make bank. Paul Bellar replied so he's got a
11 couple gun shops and ranges around him that are hiring, might
12 just work at those, save up, get rid of my debt from Michigan
13 and then get into some medic classes. Kaleb Franks replied
14 there you go; also, we're getting some stimulus so that
15 should speed up the debt portion a little. Dan Harris
16 replied do what you got to do homie, Paul Bellar replied I'll
17 probably just throw the stimulus in my savings account and
18 work down there for cash to pay off my debt with no active
19 bills in my name.

20 Q. And that's good, that's good. Next, we drop down to blue
21 targets and that's ones different. So that is a thread from
22 Mr. Bellar, Bellar on July 27th of 2020, correct?

23 A. That's correct.

24 Q. And it's clear from that thread he's leaving Michigan
25 correct?

1 A. Yes.

2 Q. And in fact, through your investigation you found out that he
3 in fact left Michigan, correct?

4 A. Correct.

5 Q. And he was down in South Caroline living with his father,
6 right?

7 A. Yes.

8 Q. Working for Door Dash, correct?

9 A. That's correct.

10 Q. And getting ready to start college so he could become a fire
11 fighter/paramedic, right?

12 A. I don't know about what he was getting ready to do.

13 Q. Okay, that's fine, that's good. So from August 20, I'm
14 sorry. So from July 27th, strike that. You talked when you
15 first met with your informant in March and you said -- you
16 said basically we met the informant, if you, the -- the --
17 the confidential human source he gave us some information, we
18 didn't have enough to act on it at that point, correct?

19 A. Well --

20 Q. When he first met with you?

21 A. I mean I wouldn't say we didn't have enough to act, we -- we
22 were receiving raw information, which is uncorroborated and
23 basically it opened the door to a lot of work?

24 Q. Absolutely. So you got to do an investigation?

25 A. Yeah, yes that's fair.

1 Q. In that investigation, it's important for you to stay in
2 complete communication with your confidential human source,
3 correct?

4 A. That's correct.

5 Q. It's important for you to keep apprised of any trainings that
6 are going on, correct?

7 A. Yes.

8 Q. Any plans that are going on to violate the laws of the United
9 States of American, correct?

10 A. Yes.

11 Q. Acts of terrorisms that's, that people are planning for or
12 preparing to do, correct?

13 A. That's correct.

14 Q. And so if you agent are made aware that individuals are on
15 their way to a certain location to kill and/or kidnap and/or
16 harm other individuals you have a duty and obligation as an
17 agent to step in, stop the investigation, and make an arrest
18 and -- and -- and saves lives correct?

19 A. No.

20 Q. You're not?

21 A. Well provided a high pathological that was a long chain of
22 events and it's just --

23 Q. I'm sorry let me rephrase it then.

24 A. -- that's not how it works.

25 Q. If you receive information that -- that an individual is

1 going to kill another individual, you have an obligation to
2 interact. You have an inner; you have an obligation to stop
3 your investigation, correct?

4 A. No.

5 Q. You don't, so you the person die?

6 A. No.

7 Q. So what do you do?

8 A. Well there's a lot of -- well that's the art of the
9 investigation. There's a lot of in between, between those
10 two extremes. So having had this experience multiple times,
11 you have to weigh the risk to public safety verse the risk if
12 you do step in. In some cases if you step in you act, the
13 government actually makes the problem worse and puts more
14 people in danger. So you have to take into account not just
15 the direct threat, but some of the indirect threats around
16 the context of the case. So just because you receive
17 information doesn't mean you run out and do something.

18 Q. Right. It's got to be --

19 A. That, yeah.

20 Q. -- it's got to be prevalent information, correct?

21 A. Sure, so there's --

22 Q. It can't be just talk right; it's got to be prevalent
23 information correct?

24 A. That's correct.

25 Q. In this case from March when you started this investigation

1 with your confidential human source all the way until July
2 27th when Mr. Bellar, Bellar left the State of Michigan you
3 never made an interact or intercede into anything, correct?
4 A. That's not correct.
5 Q. It's not correct, so you had to stop violence from occurring
6 by my client at some time during that six month, that four-
7 month period?
8 A. That's correct.
9 Q. You had to stop my client from engaging in violence?
10 A. That's correct.
11 Q. Is that the, the time in the Home Depot parking lot?
12 A. Well that might be one of the times.
13 Q. Okay. So did you ever attempt to arrest my client prior to
14 his actual arrest in October?
15 A. No, I only arrested him, or we only planned the arrest in
16 October.
17 Q. In fact after he left there was a lot of chatter to your
18 confidential human source and others that believed that Mr.
19 Bellar was a fed or informant, right?
20 A. No.
21 Q. No?
22 A. That's not correct.
23 Q. That's not correct?
24 A. No.
25 Q. So you're not aware of any text messages or Wire

1 communication or any communication whatsoever wherein someone
2 in the Wolverine Watchman believed that Mr. Bellar was a conf
3 -- was a fed or an informant?

4 A. I'm aware of what you're referring to, but that's not how I
5 interpreted it.

6 Q. Well let me ask you, did someone accuse Mr. Bellar of being a
7 fed or informant, yes or no?

8 A. Not to my knowledge.

9 Q. Not to your knowledge. Would this be another Wire or another
10 set of evidence that your other agent would have been
11 involved in?

12 A. We were both privy to the same in -- information so he didn't
13 have any communications that I didn't have.

14 Q. I'll move on, but I'm -- I'll go back to that question later.

15 THE COURT: That's okay, take your time.

16 BY MR. KIRKPATRICK:

17 Q. To your knowledge Mr. Bellar never traveled up north for
18 surveillance, correct?

19 A. Correct.

20 Q. Never travelled up north to look at bridges to blow up,
21 correct?

22 A. Not that I'm aware of.

23 Q. Never travelled up north to do surveillance on the governor's
24 house, correct?

25 A. That's correct.

1 Q. And during this training that he was involved in they never
2 trained with surveillance correct, they didn't surveillance
3 training, right?

4 A. Well the QRF team did physical surveillance that was --

5 Q. Okay. But I'm talking about training, talking about the
6 training; they didn't do any surveillance training, right?

7 A. Well they didn't, I mean they'd practice getting out of
8 vehicles and attacking, which is what would happen during
9 surveillance in the QRF.

10 Q. Okay.

11 A. So I guess in that regard I think they did practice
12 surveillance. They didn't practice sitting in cars and
13 watching things, they practiced dismounting from their
14 vehicles and attaching.

15 Q. How many times did your confidential human source advise you
16 that Mr. Bellar said that Mr. Fox is crazy? How many times
17 did he advise you that Mr. Bellar said that?

18 A. I'd have a hard time putting an exact number, but Mr. Bellar
19 did discuss Fox being crazy. I think that's a fair and
20 accurate statement and it wasn't just one time.

21 Q. More than once?

22 A. Yes.

23 Q. That he thought Mr. Fox was crazy, right?

24 A. Yes.

25 Q. And he leaves this group in July 27th of 2020 to go to South

1 Carolina correct?

2 A. He went to South Carolina, but he didn't leave the group.

3 Q. He didn't continue training with the group, right?

4 A. He con -- he continued contributing as a member of the group.

5 Q. Continued what, giving money?

6 A. I wasn't aware of him giving money.

7 Q. He never gave money to the group, right?

8 A. I'm not aware of him giving money.

9 Q. Okay. Giving ammunition, he didn't send ammunition up to

10 them, did he?

11 A. No, he didn't.

12 Q. He didn't provide any type of explosive devices to them, did

13 he?

14 A. No, he didn't.

15 Q. So by involvement you mean interacting on Wire, is that what

16 you're saying?

17 A. Yes, Wire and telephone.

18 Q. He never assisted in any surveillance of the governor's house

19 or any issues with going on the with that, correct?

20 A. That's correct.

21 Q. And you would agree with me that after July 27th of 2020 when

22 Mr. Bellar left the State of Michigan there were numerous

23 meetings that occurred after that date, correct?

24 A. I'm sorry, which date was that?

25 Q. After July 27th when Mr. Bellar leaves the State of Michigan

1 there was several other meetings after that date, fair
2 statement?

3 A. Yes.

4 Q. And several, I think we talked about one in August, was it
5 the one in August where they were going to try and start
6 getting all of the groups together and fortifying their
7 positions as groups?

8 A. In, well they had the Peebles, are you referring to the
9 Peebles Ohio meeting, the national meeting where they're
10 going to bring their attack plans to the table?

11 Q. No not that one -- I'm -- I'm not talking about that one.
12 There was one in August?

13 A. There was an August 9th meeting.

14 Q. August 9th?

15 A. Yeah, that was in Munith with Fox.

16 Q. And was that training, strike that. Then you testify about
17 the meeting in Luther Michigan on September 10th of 2020. And
18 you testified that Paul knew about it, correct?

19 A. Correct.

20 Q. But he knew about it because it was on the calendar from
21 prior to him moving the State of Michigan, correct?

22 A. That's correct.

23 Q. So you didn't have any indication that he knew about it
24 because he was continuing his contact and planning to attend
25 that, correct?

1 A. That's correct.

2 MR. KIRKPATRICK: May I approach, your Honor?

3 THE COURT: Yes.

4 MR. KIRKPATRICK: If you could put it up there

5 that'd be great, thank you, perfect.

6 BY MR. KIRKPATRICK:

7 Q. Agent Impola.

8 A. Thank you.

9 Q. I'm sorry.

10 A. No worries.

11 Q. This is a previously marked exhibit, Peoples exhibit ten B,

12 and you were going over this because it shows the command

13 structure of the Wolverine Watchman that was your testimony

14 correct?

15 A. That's correct.

16 Q. And you obtained this I think and correct me if I'm wrong in

17 August of 2020?

18 A. No, this one was October 8th, the night of the take down.

19 Q. Okay.

20 A. When the search warrant was executed at Joe's house.

21 Q. So the night of the take down, when you actually make the

22 arrests at that point this what you located, correct?

23 A. That's correct.

24 Q. You'd agree with me that my client, Mr. Bellar, is nowhere on

25 this command structure correct?

1 A. I agree, that's correct.

2 Q. He's no longer a sergeant right, he's not an executive
3 officer and he's not the commanding officer?

4 A. He's not written on that notebook is all I can say.

5 MR. KIRKPATRICK: May I have just a moment, your
6 Honor.

7 THE COURT: Take your time.

8 BY MR. KIRKPATRICK:

9 Q. So do you recall a -- I don't know if it's a Wire or if it is
10 a text messaging, but around September 15th of 2020 do you
11 recall a Wire message or a text message where Mr. Morrison
12 reaches out to your confidential human source?

13 A. Yeah, I do.

14 Q. And Mr. Morrison basically says so I guess you're out to, do
15 you recall that, something along those lines?

16 A. It sounds familiar.

17 Q. And then your confidential human source advised that it's
18 been crickets, no activity, do you recall that?

19 A. In, no activity in relation to what?

20 A. Training, planning, things along those lines?

21 A. Well I knew that Joe Morrison had one more training scheduled
22 that he reached out to our confidential human source, but I
23 do know generally speaking once the specific plot was in
24 place training died down and they were talking about that.

25 Q. And again, my clients no longer in Michigan and hasn't been

1 for almost two months now, correct?

2 A. One month.

3 Q. One month, he left July 27th, this is September 15th, so would

4 you meet me halfway, a month and a half?

5 A. I'll meet you halfway.

6 Q. Okay. So a month and a half my client has no longer been in

7 the State of Michigan and not residing in the State of

8 Michigan, correct?

9 A. That's correct.

10 Q. And when the arrests were made in October, my client had been

11 out of the State of Michigan for at least two months and

12 about a week, right?

13 A. Yeah.

14 Q. And that arrest was made in October because you had your case

15 together at that point is that a fair statement?

16 A. Well I think we had enough to -- to charge and -- and we felt

17 -- we weren't comfortable with the amount of violence that

18 could happen if we didn't go forward.

19 Q. Absolutely. That's the point I was trying to make a little

20 earlier Agent Impola. As FBI agent you have a duty to an

21 investigation, but utmost you have a duty to the protection

22 of the United States citizens, you would agree with that,

23 right?

24 A. Yes.

25 Q. Not a trick question?

1 A. No, I agree.

2 Q. And you would agree that if you had - if you knew, if you
3 knew that someone was going to be killed and/or kidnapped you
4 would get involved in that I would assume. You wouldn't let
5 it happen, right?

6 A. I would definitely take measures to eliminate the threat.

7 Q. Absolutely. And in no time from March to July 27th did you
8 ever have to interact with -- with Mr. Bellar to stop him
9 from doing something, correct?

10 A. I had to eliminate the threat without blowing the
11 investigation multiple times.

12 Q. Well he's never pointed a firearm at anybody, correct?

13 A. Correct.

14 Q. He's never fired a round off at anybody, correct?

15 A. Correct.

16 Q. He's not assaulted any police officers, correct?

17 A. Correct.

18 Q. The a -- you brought an exhibit regarding his tattoo.

19 MR. KIRKPATRICK: Can we post that exhibit of the
20 tattoo?

21 MS. DIDDAMANUI: Okay. You have to just give us a
22 moment.

23 MR. KIRKPATRICK: Certainly.

24 MS. DODDAMANI: Oh the tattoo of your client?

25 MR. KIRKPATRICK: Yeah, my clients tattoo.

1 MS. DODDAMANI: Okay.

2 MR. KIRKPATRICK: The one with the serpent and the

3 saying on there.

4 THE WITNESS: Exhibit 6 D.

5 MS. DODDAMANI: Okay.

6 THE WITNESS: Oh, I'm sorry P, six P.

7 MR. CHAMBERS: Here you go.

8 MR. KIRKPATRICK: Yep, that's it, thank you.

9 BY MR. KIRKPATRICK:

10 Q. You testified about this exhibit and the tattoo, which is the

11 snake, and you elicited that to the don't tread on me?

12 A. That's correct.

13 Q. And the a join and die, join or die?

14 A. That's correct.

15 Q. Do you know when he got this tattoo?

16 A. No.

17 Q. You were never made aware that he actually got it when he was

18 in the Army?

19 A. No.

20 Q. You don't have any information that he got this tattoo was

21 because he was part of the Wolverine Watchman group?

22 A. That's correct.

23 Q. And it wouldn't, wouldn't surprise you if you learned that

24 actually got that when he was in the Army, long before he

25 ever encountered anyone from the Watchman group?

1 A. I have no basis of information of when he got the tattoo, so
2 I don't think any -- anything would surprise me.

3 MS. DODDAMANI: That's a different one; if you want
4 to use that we don't have it our program to call up.

5 MR. KIRKPATRICK: That's fine. That's the one I
6 wanted.

7 MR. CHAMBES: Six R.

8 MY MR. KIRKPATRICK:

9 Q. Okay. And you also testified, I'm showing you Peoples
10 exhibit 6R, which is the rifle you, that you found or that's
11 a photograph that you found you equated this to Mr. Bellar,
12 correct?

13 A. That's correct.

14 Q. And you testified to the a -- the piece on the end there as
15 being a suppressor?

16 A. Well it could be a suppressor, I can't tell from the
17 photograph.

18 Q. Okay. Were you the one that took these photographs?

19 A. I was not.

20 MR. KIRKPATRICK: May I approach?

21 THE COURT: Yes.

22 BY MR. KIRKPATRICK:

23 Q. Does that look to you to be the same firearm, just from a
24 different angle?

25 A. Yes, it does.

1 Q. Do you notice on that suppressor whether it is drilled or
2 not?

3 A. I can't quite see, but it looks like, I don't see a hole.

4 Q. Right.

5 A. And it's --

6 Q. And in order for these to work --

7 MR. KIRKPATRICK: Your Honor I'll get the color
8 photo, I -- I'll bring it back tomorrow. I would -- I would
9 move for the introduction of the defendants Bellar?

10 THE COURT: Be two?

11 MR. KIRKPATRICK: That would be Bellar two.

12 MS. DODDAMANI: I'm sorry, is that what he was just
13 explained to, or is he testifying to what was put up on the
14 screen?

15 MR. KIRKPATRICK: No, I should have, I asked him
16 that and I showed him this.

17 MS. DODDAMANI: Okay. And that's, so his testimony
18 was that that's fair and accurate?

19 MR. KIRKPATRICK: Correct.

20 MS. DODDAMANI: Then we don't have an objection.

21 THE COURT: And I'm assuming the defendants have
22 none either?

23 MR. JOHNSON: No, your Honor.

24 MR. SOMBERG: No, your Honor.

25 THE COURT: We'll consider that Bellar, two but

1 yeah, you'll bring us a color photo?

2 MR. KIRKPATRICK: I'll get you a color, your Honor.

3 (At 4:30 p.m., DX Bellar 2 admitted)

4 BY MR. KIRKPATRICK:

5 Q. So in order for that to be legal it has to be actually

6 drilled through it, correct?

7 A. Well if you drill it, and it's not registered then it's

8 illegal.

9 Q. Right

10 A. And if it's not drilled then it's not an NFA weapon.

11 Q. All right. So there's nothing illegal about that weapon

12 correct?

13 A. So I mean there's no hole on it.

14 Q. Right.

15 A. Correct.

16 Q. I promise you I wouldn't do that to you. And it also, it

17 also, are you familiar with guns at all?

18 A. I am.

19 Q. It could also be used as a cleaning mechanism, trying to get

20 all of the oil out of the barrel as well, correct?

21 A. Sure.

22 Q. Let's save your carpet so you don't get carpet stains on the

23 --

24 A. Oh sure, yeah.

25 MR. KIRKPATRICK: This is what we got of Bellar,

1 which is training schedule.

2 MS. DODDAMANI: It's just like that one. What
3 number is it, fourteen?

4 MR. KIRKPATRICK: Thank you, thank you. I promise
5 I'm about done.

6 MS. DODDAMANI: No that's fine, just if you would
7 make sure to reference it, which you have been, the exhibit
8 number would explain.

9 BY MR. KIRKPATRICK:

10 Q. Agent I'm showing you Peoples exhibit fourteen and it's back
11 up here on the screen and this is, you had testified that
12 this is a training schedule that was developed by Mr. Bellar?

13 A. That's correct.

14 Q. Would you point to me on that training schedule where it says
15 anything about storming the State Capital?

16 A. Well it doesn't say those words anywhere on the -- on the
17 training schedule.

18 Q. Can you show me on that training schedule where it shows
19 training for surveillance?

20 A. I'd point to the vehicle operations around the A and B
21 pillars.

22 Q. Okay. You would consider that to be surveillance, or would
23 you consider that to be position of advantage if you're in
24 firefight?

25 A. Well I'd consider it getting into a firefight from

1 surveillance or from a vehicle.

2 Q. You would agree with me though on this training schedule
3 there's nothing in here specific to attacking any federal or
4 state building specifically, correct?

5 A. Correct. They just generally speak about ambushes; they
6 don't provide specifics.

7 Q. Correct. So this is a basic training outline for training in
8 their group for that particular occasion, is that a fair
9 statement?

10 A. Yes.

11 Q. The -- under the ambush attacks the -- so the second
12 paragraph, the last sentence, what does that say again?

13 A. It says I don't know jack shit about ambushes, so this is all
14 Beeker and Dan's shit, I'm out, laugh my ass off.

15 Q. So the guy that actually is doing all this tactical training
16 for you is actually putting on here that he doesn't know shit
17 about ambushes, is that a fair statement?

18 A. Yes.

19 Q. And in fact is Dan your confidential human source?

20 A. He is.

21 Q. So Dan's the one that knows all of the shit and Beeker?

22 A. Yes.

23 Q. Agent I'm showing you Peoples exhibit thirteen and this is a
24 handwritten note dated April 19th of 2020 regarding Mr.
25 Bellar, is that correct?

1 A. That's correct.

2 Q. And again, there's nothing on this handwritten statement that
3 talks about training to attack any government building,
4 correct?

5 A. That's correct.

6 Q. Talk about storming the Capital correct, nothing on here
7 talks about that, right?

8 A. Correct.

9 Q. Nothing on here talks about kidnapping the governor, correct?

10 A. That's correct.

11 Q. Okay. This is basic training maneuvers that were put forth
12 for this training session on or about April 19th, is that a
13 fair statement?

14 A. Yes.

15 Q. You talked about at the -- was it the first meeting on June
16 28th with -- when Adam Fox came to the Munith site. Let's
17 just put out there, you would agree that Adam Fox as -- as
18 far as up north, he's probably the one that's most involved
19 in this?

20 A. Yes.

21 Q. Does that sound about right?

22 A. Yes.

23 Q. I mean we can all read the discovery in this case to know
24 that, correct?

25 A. Yes.

1 Q. So June 28th was the first training session that Adam Fox had
2 went to in Munith, correct?

3 A. That's correct.

4 Q. And you talk about he had done a -- he had done a -- he had
5 done a swearing in to the Three Percenters?

6 A. Correct.

7 Q. And the Three Percenters is a, explain to me what that is
8 again?

9 A. Well the Michigan Patriot Three Percenters was a Facebook
10 group and an umbrella organization created by Adam Fox as a
11 cover for recruiting and communicating amongst the operators
12 that he'd chosen to attack the governor.

13 Q. And in fact, at that meeting Mr. Fox asked my client Mr.
14 Bellar if he wanted to swear into that group as well,
15 correct?

16 A. I think that's fair, yes.

17 Q. And he declined, right?

18 A. Yes.

19 Q. He did not want to be a part of that group, correct?

20 A. He was already a part of the Watchman.

21 Q. He didn't do the oath for the Three Percenters, correct?

22 A. Correct.

23 Q. When you were doing this case were you monitoring another
24 chatter if you will from different citizens in Michigan or
25 was this the only case you were working on? And I -- I

1 don't, I don't -- I don't want you to go into your case, I'm
2 not asking you any of that.

3 A. Yeah.

4 Q. So please don't -- don't think I'm asking you that, I'm not -
5 - I'm not going to go there. But I assume you were looking
6 at other things that were going on in Michigan during this
7 time period, correct?

8 A. Yeah, so I had other cases and then we received other
9 complaints, and then you know I'm aware of generally speaking
10 what's going on in the militia community or the -- you know
11 the anarchist community.

12 Q. And you would agree with me that during this time period, and
13 maybe even still today there were a lot of people that were
14 upset about the shutdown.

15 A. Absolutely.

16 Q. Not just militia, but everyday restaurant owners right,
17 correct?

18 A. Correct.

19 Q. Individuals that cut hair, correct?

20 A. Correct.

21 Q. And a lot of people said a lot of off the wall things, is
22 that a fair statement?

23 A. Absolutely.

24 Q. The monitoring of the surveillance and the ultimate plans to
25 kidnap the governor, you continue to monitor those, correct?

1 A. Yes.

2 Q. And is it a fair statement that the terminology that was
3 brought to them was not used during their further trainings
4 after Mr. Bellar left?

5 A. I'm sorry which terminology are you talking about?

6 Q. They had a meeting on July 7th?

7 A. That's correct.

8 Q. Where he had came up with some terminology of things. The
9 group didn't continue to use that terminology after he had
10 left, correct?

11 A. I think the group, they never -- they never really used the
12 terminology very much.

13 Q. Correct, thank you. And I think I've asked you this already.

14 MR. KIRKPATRICK: And I'm about wrapping it up
15 judge.

16 MR. KIRKPATRICK:

17 Q. Mr. Bellar never provided any financial support to the
18 Wolverine Watchman, correct?

19 A. Not to my knowledge.

20 Q. Never provided ammunition, correct?

21 A. Correct.

22 Q. Never provided explosive devices, correct?

23 A. Correct.

24 Q. Never provided specific trainings, specific to the Capital
25 itself, correct?

1 A. He provided training, which could be used at the Capital and
2 he knew it would be used at the Capital.

3 Q. He never specifically trained individuals for the Capital
4 itself, correct?

5 A. He didn't say the words this is for the Capital.

6 Q. Thank you. As far as, same question, now we're talking about
7 the governor's house. He never trained specifically and said
8 the governor's house correct?

9 A. I'm trying to remember, there was a lot of discussion about
10 the governor's house before the plot involved the kidnapping.

11 Q. I'm just talking just about specific training, the actual
12 training itself. The actual firing of a rifle, going through
13 a door, going through a makeshift plywood structure, during
14 those trainings he never --

15 A. No I dis --

16 Q. -- mentioned that correct?

17 A. I disagree with that. He did talk about getting into a
18 firefight with the governor's protection detail.

19 Q. He did, my, Mr. Bellar said that?

20 A. Yes.

21 Q. When exactly did he say that?

22 A. That was on the June 20th Vac Shack meeting with Adam Fox.
23 They talked how they'd have to kill the governor's protection
24 detail in order to attack.

25 Q. To your knowledge -- to your knowledge on your investigation

1 Mr. Bellar never had any plans to come back to Michigan to
2 engage in this behavior with the governor once he left in
3 July 27th?

4 A. Well all I know is the exhibit that I previously read which
5 said he might come back. But I -- I don' have any knowledge
6 about him coming back to engage in the plot.

7 MR. KIRKPATRICK: I have no further questions.

8 THE COURT: I'm going to leave it up to you, Mr.
9 Somberg; it's about a quarter to five. We're going to end at
10 five, if you want to start a cross-examination and then
11 reconvene tomorrow at nine. On the other hand, if you
12 believe it would be counterproductive for you to do that,
13 it's quite clear this witness is coming back tomorrow because
14 we haven't had Mr. Johnson and I haven't had re-direct. So
15 you get -- you get to control the room.

16 MR. SOMBERG: Thank you, your Honor. I'd like to
17 start fresh in the morning.

18 THE COURT: Okay. I think that's a reasonable
19 response. Do you want to stay all night Mr. Johnson? Okay.
20 Mr. Kirkpatrick you're going to bring us in that color photo
21 tomorrow so we can mark it as your client's number two
22 exhibit.

23 MR. KIRKPATRICK: Yes, your Honor, yes.

24 THE COURT: Okay.

25 MS. DODDAMANI: Can we also have a copy judge of all

1 of the defenses exhibits?

2 THE COURT: Okay.

3 MS. DODDAMANI: Thank you.

4 MR. KIRKPATRICK: I didn't give you one, I have
5 them, I'm sorry.

6 MR. TOWNSEND: We have this one.

7 MR. KIRKPATRICK: I have them in my bag.

8 MS. DODDAMANI: Thank you.

9 THE COURT: So we'll restart tomorrow at nine a.m..

10 THE COURT: Mm-hmm.

11 MR. SOMBERG: Are we good judge?

12 THE COURT: What, yeah we're good.

13 (At 4:44 p.m., proceedings concluded)

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CERTIFICATION

I certify that this transcript, consisting of 268 pages, is a complete, true, and correct transcript of the proceedings and testimony taken in this case Wednesday March 3, 2021

Date: March 19, 2021

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